

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 HOUSTON DIVISION
4 UNITED STATES OF AMERICA, *
5 Plaintiff, *
6 VS. * Case No. 4:17-cv-01164
7 CHRIS C. ULASI, MICHAEL *
8 UMEORAH, ANGELA UMEORAH *
9 NINA U. DENCHUKWU, and *
10 OCWEN LOAN SERVICING, LLC *
11 Defendants. *
12 *****
13 THE ORAL
14 DEPOSITION OF
15 ANGELA UMEORAH
16 MARCH 15, 2018
17 *****
18 ORAL DEPOSITION OF ANGELA UMEORAH, produced as a
19 witness at the instance of the PLAINTIFF, and duly
20 sworn, was taken in the above-styled and numbered
21 cause on the 15th of March, 2018, from 9:47 a.m. to
22 12:54 p.m., before Debbie Boothe, CSR, in and for the
23 State of Texas, reported by machine shorthand at the
24 U.S. Attorney's Office, 1000 Louisiana, Suite 2300,
25 Houston, Texas 77002, pursuant to the Federal Rules of
Civil Procedure and the provisions stated in the record
or attached hereto.

Page 2

1 APPEARANCES
2 FOR THE PLAINTIFF:
3 Ms. Stephanie M. Page
4 United States Department of Justice
5 Tax Division
6 717 N. Harwood Street, Suite 400
7 Dallas, Texas 75201
8 (214) 880-9721 (214) 880-9774
9 stephanie.m.page@usdoj.gov
10
11 FOR THE DEFENDANTS CHRIS C. ULASI AND NINA U. DENCHUKWU:
12 Mr. Floyd E. James, Sr. (Not Present)
13 Floyd E. James, Sr. & Associates, P.C.
14 6200 Savoy, Suite 260
15 Houston, Texas 77036
16 (713) 981-8600 (713) 334-3270
17 floydjlaw@sbcglobal.net
18
19 FOR THE DEFENDANTS MICHAEL UMEORAH AND ANGELA UMEORAH:
20 Mr. Cornel A. Williams
21 Cornel A. Williams & Associates
22 1405 Palm Street
23 Houston, Texas 77004-5740
24 (713) 520-5153 (713) 524-4528 Facsimile
25 willassoc@aol.com

**Government
Exhibit**

G

Page 3

1 INDEX
2
3 WITNESS: ANGELA UMEORAH
4 PAGE
5 Appearances 2
6 Examination by Ms. Stephanie M. Page 8
7 9:47 a.m. - 11:50 a.m.
8 11:59 a.m. - 12:54 p.m.
9 Changes and Signature 130
10 Reporter's Certificate 132
11
12 * * * * *

Page 4

1 EXHIBIT INDEX
2 NUMBER DESCRIPTION PAGE
3 Exhibit 1 Amended Disclosure Statement of
4 Jubilee Group Homes, Inc. 29
5 Exhibit 2 United States Bankruptcy Court
6 Southern District of Texas
7 Houston Division, Voluntary
8 Petition Jubilee Group Homes, Inc. 29
9 Exhibit 3 Wells Fargo Business Account
10 Application Jubilee Group Homes,
11 Inc. Account Number [Redacted] 3681 60
12 Exhibit 4 Wells Fargo Basic Business Checking
13 Jubilee Group Homes, Inc.
14 Account Number [Redacted] 3681 61
15 Exhibit 5 Wells Fargo Business Account
16 Application Jubilee Group Homes,
17 Inc. Account Number [Redacted] 3381 64
18 Exhibit 6 Wells Fargo Combined Statement
19 of Accounts Jubilee Group Homes,
20 Inc. Account Number [Redacted] 3381 and
21 [Redacted] 3395 66
22 Exhibit 7 Wells Fargo Business Account
23 Application Jubilee Group Homes,
24 Inc. Account Number [Redacted] 9147 71
25

Page 9	Page 11
<p>1 A. The bank statements, I looked at them again.</p> <p>2 Q. Okay. And these are bank --</p> <p>3 MR. WILLIAMS: What else? She's talking</p> <p>4 about everything.</p> <p>5 THE WITNESS: Oh.</p> <p>6 Q. (BY MS. PAGE) In preparation for this</p> <p>7 deposition --</p> <p>8 A. Yes.</p> <p>9 Q. -- you looked at the bank statements that your</p> <p>10 attorney had?</p> <p>11 A. And I looked at the interrogatories as well. I</p> <p>12 did look at the interrogatories as well.</p> <p>13 Q. Your answers to the interrogatories, is that</p> <p>14 what you're talking about?</p> <p>15 A. Yeah. Yes.</p> <p>16 Q. Okay. Have you ever had your deposition taken</p> <p>17 before?</p> <p>18 A. No.</p> <p>19 Q. So as you know, you're testifying under oath.</p> <p>20 If you need a break, just let me know, and we will take</p> <p>21 one as soon as convenient. However, if I ask a</p> <p>22 question, I will ask that you answer the question before</p> <p>23 we take a break. If you don't hear or understand the</p> <p>24 question, let me know, and I'll repeat it.</p> <p>25 A. Okay.</p>	<p>1 we -- we just got resolution, Jubilee got a resolution.</p> <p>2 And my husband, actually, is going to go make the</p> <p>3 initial payment, I think.</p> <p>4 Q. Okay. So there was an agreed judgment in that?</p> <p>5 A. Uh-huh. Uh-huh.</p> <p>6 Q. And was it a suit to enjoin Jubilee or to order</p> <p>7 Jubilee to make tax deposits, payroll tax deposits?</p> <p>8 A. The way I understand the particular suit, it</p> <p>9 was a suit against some taxes that Jubilee owed, and an</p> <p>10 agreement was reached. And the way for Jubilee to pay</p> <p>11 off that debt was agreed upon.</p> <p>12 Q. Okay.</p> <p>13 A. Actually, my husband has been paying that.</p> <p>14 He's been making that payment. Then he stopped for a</p> <p>15 while because he didn't know where that case was going,</p> <p>16 but then now we've received a final judgment. The Court</p> <p>17 has said, "Okay. Jubilee, pay this amount," and they've</p> <p>18 agreed on the installment -- installment payment, and</p> <p>19 he's going off to do that first payment today.</p> <p>20 Q. Are you talking about he's -- he's entered some</p> <p>21 agreement to pay back taxes?</p> <p>22 A. This is with Jubilee; right? He's the one --</p> <p>23 Q. Jubilee, right.</p> <p>24 A. Yeah. He will be the one to answer exactly,</p> <p>25 but this is my understanding. My understanding is that</p>
Page 10	Page 12
<p>1 Q. If you answer a question, I will assume that</p> <p>2 you've heard it and understood it. Is that --</p> <p>3 A. (Witness nodding head.)</p> <p>4 Q. Okay. Please answer verbally -- no head</p> <p>5 nods -- so that she can get that on the record.</p> <p>6 A. All right.</p> <p>7 Q. Are you familiar with the lawsuit that was</p> <p>8 filed by the United States against Jubilee Home Care --</p> <p>9 A. Yes.</p> <p>10 Q. -- Health Home Care?</p> <p>11 A. Yes.</p> <p>12 Q. And what's your understanding of that lawsuit?</p> <p>13 A. That there are some trust fund that was not</p> <p>14 paid back to the government, and part of us are being</p> <p>15 sued regarding that trust fund.</p> <p>16 Q. The trust fund recovery penalty?</p> <p>17 A. Yes.</p> <p>18 Q. And also there's income tax liability that's</p> <p>19 being -- that's part of the suit?</p> <p>20 A. Yes.</p> <p>21 Q. There's also -- there was also a suit that the</p> <p>22 government filed against Jubilee, not you the</p> <p>23 individuals, but against Jubilee. It was an injunction</p> <p>24 lawsuit. Do you recall that?</p> <p>25 A. There's one -- there was one that I know that</p>	<p>1 one, it didn't involve us. It was for Jubilee as a</p> <p>2 corporate entity. And there was some back taxes, and an</p> <p>3 agreement was reached on a payoff and the way to pay</p> <p>4 that off. And he just recently got that agreement.</p> <p>5 Q. Okay.</p> <p>6 A. And today he's making -- actually, he went to</p> <p>7 make the first payment, because I think he said it had</p> <p>8 to be in before Monday, you know, in the daytime.</p> <p>9 Q. Okay. Well, I will ask him about that.</p> <p>10 A. He will know. He will give you better details,</p> <p>11 but I know that agreement was just reached recently. He</p> <p>12 just got that in the mail.</p> <p>13 Q. Is Jubilee making its payroll taxes currently?</p> <p>14 A. Since my husband started handling it, he's</p> <p>15 making it as when due on -- on the taxes.</p> <p>16 Q. And when did your husband start handling it?</p> <p>17 A. When he came back, some point between 2014 and</p> <p>18 2015 -- hold on. Let me get that right. He came back</p> <p>19 in 2016, and I think it's after that that he started</p> <p>20 handling it, after he came back.</p> <p>21 Q. Okay. So Mr. Umeorah --</p> <p>22 A. At some point in 2016, 2017. He will be better</p> <p>23 able to tell you. But between 2016 and 2017 when, in</p> <p>24 fact, he took over paying the taxes, it has been paid</p> <p>25 when due.</p>

<p style="text-align: right;">Page 17</p> <p>1 Q. Uh-huh.</p> <p>2 A. I have a license for registered nurse.</p> <p>3 Q. And can you tell me when you got that?</p> <p>4 A. 1990 or '92, in there.</p> <p>5 Q. Okay.</p> <p>6 A. And then I have my advanced practice nurse,</p> <p>7 like I have another license to be a nurse practitioner.</p> <p>8 Q. And you got that in 2016?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Okay. Let me ask you about your -- your</p> <p>11 employment history.</p> <p>12 A. Okay.</p> <p>13 Q. Starting with -- let's start with when you came</p> <p>14 to the United States.</p> <p>15 A. All right.</p> <p>16 Q. So that's about 1990?</p> <p>17 A. 1988.</p> <p>18 Q. Okay. So if you can just tell me where you</p> <p>19 worked, what you did --</p> <p>20 A. All right. Okay.</p> <p>21 Q. -- the best you can.</p> <p>22 A. I remember most of it. I mean, it's a lot, but</p> <p>23 I remember. So I came in 1988. We opened an African</p> <p>24 food store. We kind of opened an African food store not</p> <p>25 too long from there. Like about 1988, '89, we opened an</p>	<p style="text-align: right;">Page 19</p> <p>1 still worked at the store my off days and all that. If</p> <p>2 my husband traveled, I worked there as well. So I</p> <p>3 worked both jobs.</p> <p>4 I went to West Houston. That name has</p> <p>5 changed now. It's no longer West Houston. It's owned</p> <p>6 by the HCA, Columbia HCA Community, part of their</p> <p>7 hospital. So I was at West Houston, and it is -- it's a</p> <p>8 hospital, and I was working PRN. I worked PRN there.</p> <p>9 And then in there as well, while I was</p> <p>10 working there, we opened -- I think at that time we</p> <p>11 opened Jubilee, 1992, '93 or so, there around. I'm not</p> <p>12 too sure of the dates now. So we opened Jubilee, and</p> <p>13 then I was the nurse there. I was acting as the nurse</p> <p>14 for Jubilee as well as, you know, being part of the</p> <p>15 owner.</p> <p>16 Some point there, we also opened -- I'm</p> <p>17 trying to think. So at that time I basically wasn't</p> <p>18 working for any hospitals. I working Jubilee, working</p> <p>19 our food store and I believe up until -- when I left,</p> <p>20 when I left in 2004. Then --</p> <p>21 Q. Okay. 2004 you left where?</p> <p>22 A. I left, I went back home. I took my child,</p> <p>23 everything, we moved back to Nigeria.</p> <p>24 Q. Went to Nigeria?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 18</p> <p>1 African food store. So we were working there in our</p> <p>2 food store. I went to nursing school while we operated</p> <p>3 that store. So I was working at the food store and</p> <p>4 going to nursing school.</p> <p>5 So when I graduated from nursing school, my</p> <p>6 very first employment was at the Methodist Hospital in</p> <p>7 the ICU. So I worked at the Methodist Hospital ICU. I</p> <p>8 transferred and started working PRN at --</p> <p>9 MR. WILLIAMS: She's trying to figure out</p> <p>10 the times.</p> <p>11 THE WITNESS: Oh, the time frames as well.</p> <p>12 Q. (BY MS. PAGE) Let me just interrupt. Did your</p> <p>13 husband and you open the African food store --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- or was it --</p> <p>16 A. No, we opened it.</p> <p>17 Q. Just you two?</p> <p>18 A. Yeah.</p> <p>19 Q. Okay. All right. So Methodist Hospital ICU?</p> <p>20 A. So that would be like from -- and I can't be</p> <p>21 sure of the dates now. So in 1990, I got my license. I</p> <p>22 went in there right away. So between there -- I didn't</p> <p>23 stay up to a year even. So between 1990, 1991, I was</p> <p>24 there. I mean, but remember now, even as I worked as a</p> <p>25 nurse, I also worked at the store. I mean, you know, I</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. So did your husband also move?</p> <p>2 A. My husband moved but not immediately. Myself</p> <p>3 and my son went first. He didn't move, I believe, until</p> <p>4 like 2006. And I think, you know, that's correct.</p> <p>5 Q. Okay. Why did you go back to Nigeria?</p> <p>6 A. My family -- my dad had so much going on in his</p> <p>7 businesses, and he needed help, needed, you know, for us</p> <p>8 to help him to run some businesses and some family</p> <p>9 issues.</p> <p>10 Q. Okay. So what did you do in Nigeria?</p> <p>11 A. So I helped my dad. He had several businesses.</p> <p>12 So I worked with him mostly. That's mostly what I did,</p> <p>13 helped him run his affairs.</p> <p>14 Q. And how old was your son when you moved?</p> <p>15 A. Chikem was 4 years old.</p> <p>16 Q. Okay.</p> <p>17 A. So we mostly worked for my dad, but we had --</p> <p>18 when my husband came, we then had some other businesses</p> <p>19 we ran as well.</p> <p>20 Q. In Nigeria?</p> <p>21 A. Yes.</p> <p>22 Q. What kind of businesses were they?</p> <p>23 A. We dabbled into trying to make noodles.</p> <p>24 Q. Okay. So when did you move back to the</p> <p>25 United States?</p>

Page 21	Page 23
<p>1 A. In -- anyway -- no, there's another part to it.</p> <p>2 So when I was there in Nigeria, right, I would come</p> <p>3 back. And I think I didn't come back -- there was like</p> <p>4 a period of three, four, five years I never even came</p> <p>5 back. Then I started coming back when things got a bit</p> <p>6 rough there, so then coming back and working as a nurse.</p> <p>7 So -- and I'll tell you where I worked at</p> <p>8 that time. But I believe I started coming either 2009</p> <p>9 or 2010 as visiting, but it would mainly be when my son</p> <p>10 is on holidays, like during the summer, maybe Christmas</p> <p>11 break. And when I came, I worked at the hospital --</p> <p>12 what's the name of the hospital now that closed down.</p> <p>13 It's a psyche hospital, Riverside. So I got a contract</p> <p>14 with Riverside. Up through that period I was in</p> <p>15 Nigeria, I mainly worked for them.</p> <p>16 So whenever I come in, they'll give me a</p> <p>17 contract, Riverside General Hospital. So I worked for</p> <p>18 them. And I believe, also, there's another agency I</p> <p>19 would take some shifts from and work for that agency as</p> <p>20 well.</p> <p>21 Q. And what time period was this that you --</p> <p>22 A. Sorry?</p> <p>23 Q. What timed period were you working as a</p> <p>24 contract nurse?</p> <p>25 A. Oh, it was -- from that -- when I started doing</p>	<p>1 A. 2012.</p> <p>2 Q. Okay. You mentioned that your husband -- how</p> <p>3 long did your hus -- did your husband always live here</p> <p>4 or --</p> <p>5 A. Oh, no. When he moved in 2006, he lived in</p> <p>6 Nigeria. We both were there. As a matter -- yeah.</p> <p>7 Q. Okay. So this -- Old Windsor, were you living</p> <p>8 in -- when did you move into Old Windsor?</p> <p>9 A. 2000.</p> <p>10 Q. And you still live there?</p> <p>11 A. Yes.</p> <p>12 Q. Did you ever rent out Old Windsor?</p> <p>13 A. Uh-uh.</p> <p>14 Q. So Old Windsor -- what happened to the Old</p> <p>15 Windsor house while you were --</p> <p>16 A. While we were there, we kept the house. And,</p> <p>17 you know, we had a family that would go check our mail</p> <p>18 and stuff, but we kept our house.</p> <p>19 Q. Okay. So you just said that your husband moved</p> <p>20 to Nigeria --</p> <p>21 A. 2006.</p> <p>22 Q. -- in 2006?</p> <p>23 A. Yes.</p> <p>24 Q. Until when?</p> <p>25 A. He came back -- we came back before him. So we</p>
Page 22	Page 24
<p>1 it, I did it from about 2009 until I came back finally,</p> <p>2 but it would be only on holidays.</p> <p>3 Q. Okay.</p> <p>4 A. It would only be when my son could come with</p> <p>5 me, which was sometimes over the summer, sometimes</p> <p>6 during Christmas breaks.</p> <p>7 Q. Was your son registered in school there?</p> <p>8 A. My son actually attended American International</p> <p>9 School in Lagos, and he -- yeah.</p> <p>10 Q. Where is Lagos?</p> <p>11 A. Lagos is a -- it used to be the capital city of</p> <p>12 Nigeria before they moved it to Abuja, but now it's like</p> <p>13 the commercial heart.</p> <p>14 Q. Okay. So from what year to what year did your</p> <p>15 son attend?</p> <p>16 A. He started first grade there in 2004. No,</p> <p>17 not -- he started pre-K. He was 4. He started pre-K</p> <p>18 there in 2004, and he was there all the way to sixth</p> <p>19 grade.</p> <p>20 Q. Okay. And then what happened after sixth</p> <p>21 grade?</p> <p>22 A. No -- we came here.</p> <p>23 Q. Okay.</p> <p>24 A. Yeah.</p> <p>25 Q. So when -- when did you move back here?</p>	<p>1 came back in 2012, and I believe he came back 2014.</p> <p>2 Q. So when Jubilee -- you said Jubilee opened in</p> <p>3 1992?</p> <p>4 A. I'm not exactly sure now. Like don't hold me</p> <p>5 to it, but I know that I had graduated from nursing</p> <p>6 school. I was a nurse. So in between there, in between</p> <p>7 1992 and 1996, you know, somewhere in there we opened</p> <p>8 Jubilee. And, you know, I have to go back. I didn't go</p> <p>9 refresh in my mind exactly when it opened. But it's in</p> <p>10 there, in between when I got out of school in 1992 to,</p> <p>11 you know, 1996, somewhere in there.</p> <p>12 Q. And how did that company come to be formed, or</p> <p>13 how did you get involved in that company?</p> <p>14 A. So Jubilee Group Homes, we -- the idea came</p> <p>15 from me and my husband. And at the time, you know,</p> <p>16 Dr. Chris Ulasi was my husband's childhood friend, and</p> <p>17 we were very close. So we -- when we got the idea for</p> <p>18 this business, we asked him to join us in the business.</p> <p>19 And I'm not sure now whether the wife was there from the</p> <p>20 beginning, you know, but she also was there. So she</p> <p>21 joined as well. So --</p> <p>22 Q. And who is -- okay. So you're talking about</p> <p>23 Chris Ulasi?</p> <p>24 A. Yes.</p> <p>25 Q. Or Ulasi?</p>

<p style="text-align: right;">Page 25</p> <p>1 A. Yes.</p> <p>2 Q. And his wife --</p> <p>3 A. Yes.</p> <p>4 Q. -- what's her name?</p> <p>5 A. Nina.</p> <p>6 Q. Nina?</p> <p>7 A. Denchukwu.</p> <p>8 Q. Does she go by --</p> <p>9 A. Denchukwu.</p> <p>10 Q. Okay. So it was you and your husband's idea to</p> <p>11 form the company sometime in the '90s?</p> <p>12 A. Yes, and both of them joined. But they were</p> <p>13 there from the beginning. So all of us joined and</p> <p>14 formed the company. We just started the company and got</p> <p>15 it going.</p> <p>16 Q. And what was the purpose of the company?</p> <p>17 A. We kept -- it was like -- it's a group home.</p> <p>18 So we keep homes for the mentally retarded that come out</p> <p>19 of the state schools.</p> <p>20 Q. Were you an owner of the company?</p> <p>21 A. Yes, I'm the owner.</p> <p>22 Q. Are you still a part owner?</p> <p>23 A. Yes.</p> <p>24 Q. Who else are owners?</p> <p>25 A. Michael, Chris and Nina.</p>	<p style="text-align: right;">Page 27</p> <p>1 name was removed from the account.</p> <p>2 Q. Okay.</p> <p>3 A. And I never submitted a letter to say,</p> <p>4 "Look" --</p> <p>5 Q. Resigned, that's the word I'm looking for.</p> <p>6 A. Yes. I never submitted a letter to resign, but</p> <p>7 I was -- my name was removed from operations of the</p> <p>8 bank. Operations of the company, my name was removed.</p> <p>9 Q. In the beginning of the business -- when I</p> <p>10 refer to "business" or "company," I'm referring to</p> <p>11 Jubilee Group Homes, Inc.</p> <p>12 A. Uh-huh. I understand.</p> <p>13 Q. How many offices or how many divisions did</p> <p>14 Group Home -- did Jubilee have, and where were they?</p> <p>15 A. So Jubilee opened in Houston; and then a</p> <p>16 Corpus Christi branch was opened; a McAllen branch was</p> <p>17 opened in the Valley; a Beaumont branch was opened.</p> <p>18 Q. Were they all opened at the same time?</p> <p>19 A. No. Houston was first, and then the others</p> <p>20 followed but one at a time.</p> <p>21 Q. And part of the business was finding homes to</p> <p>22 place the patients; is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. Did you own any of the -- you or your husband</p> <p>25 own any of the homes?</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. Are you also an officer?</p> <p>2 A. I mean, I don't run it day-to-day, you know.</p> <p>3 My name is there, but I don't -- I'm not -- yeah. You</p> <p>4 know, I do some things for them. I guess I'm an</p> <p>5 officer. You can put it that way.</p> <p>6 Q. And have you been an officer throughout the</p> <p>7 opening till now?</p> <p>8 A. By the time -- when I traveled and I wasn't</p> <p>9 here, I was -- my name wasn't even there. I did</p> <p>10 nothing. I wasn't part of that business anymore when I</p> <p>11 was out. From beginning of -- even after I came back, I</p> <p>12 wasn't part of it. Beginning 2004 when I left, until</p> <p>13 2014 or '16, in there, whenever my name came back into</p> <p>14 the company, was when I started knowing what was going</p> <p>15 on.</p> <p>16 So I know we have a signature card when I</p> <p>17 our names went back to be a signatory in the account.</p> <p>18 That is when I could look to even see what was going on.</p> <p>19 Before that time, you know, I knew nothing. My name was</p> <p>20 no longer there.</p> <p>21 Q. But you never -- you were always a director.</p> <p>22 You never -- I can't think of the word -- you never quit</p> <p>23 being a director? You never formally quit and said "I'm</p> <p>24 not going to be a director" during that time period?</p> <p>25 A. I never wrote a letter, but inadvertently my</p>	<p style="text-align: right;">Page 28</p> <p>1 A. They were put variously in our names, yes.</p> <p>2 Yes, we did.</p> <p>3 Q. Okay. And did Jubilee pay rent to you --</p> <p>4 A. No.</p> <p>5 Q. -- on the homes?</p> <p>6 A. No. No.</p> <p>7 Q. Okay. Let's go through these homes. The</p> <p>8 Hidden Valley home --</p> <p>9 A. I wouldn't remember which one is in my name,</p> <p>10 which one I owned. I wouldn't remember, if that's the</p> <p>11 question.</p> <p>12 MR. WILLIAMS: Let her ask the question</p> <p>13 first.</p> <p>14 THE WITNESS: Oh, okay. All right. Go</p> <p>15 ahead.</p> <p>16 Q. (BY MS. PAGE) So you don't remember --</p> <p>17 A. I remember the home, but if it's -- but I</p> <p>18 couldn't tell you now whether that one was in my name or</p> <p>19 Michael's name. I'm sorry. If it that's your question,</p> <p>20 I couldn't tell.</p> <p>21 Q. So did you or Michael own Hidden Valley, that</p> <p>22 property?</p> <p>23 A. Like I said, right, I know I owned some, I know</p> <p>24 Michael owned some. I don't know which one is which,</p> <p>25 which one that I owned or which one Michael owned. But</p>

Page 29	Page 31
<p>1 I know that there are records. Anyone that say that I</p> <p>2 owned, that was in my name was in my name. But I don't</p> <p>3 know whether it was Spring Valley or Hidden or the</p> <p>4 particular address, right? I can't remember.</p> <p>5 Q. Okay.</p> <p>6 MS. PAGE: Okay. Let's go ahead and mark</p> <p>7 this. Let's go ahead and get this one marked as</p> <p>8 Exhibit 1.</p> <p>9 (Exhibit 1 marked.)</p> <p>10 Q. (BY MS. PAGE) Ms. Umeorah, you're aware that</p> <p>11 the company filed bankruptcy at some point?</p> <p>12 A. You know, I was told. I wasn't part of that</p> <p>13 filing.</p> <p>14 Q. Okay. Let's put this aside. I gave you the</p> <p>15 wrong thing.</p> <p>16 MS. PAGE: I want to get that marked as</p> <p>17 Exhibit 2. And we'll just put Exhibit 1 to the side for</p> <p>18 a minute.</p> <p>19 (Exhibit 2 marked.)</p> <p>20 Q. (BY MS. PAGE) Now, Exhibit 2, I don't know if</p> <p>21 you're familiar with this or not. This is a petition</p> <p>22 and the schedules that were filed in Jubilee's</p> <p>23 bankruptcy.</p> <p>24 A. Okay.</p> <p>25 Q. So let's move to Page 15. It's at the top, it</p>	<p>1 see if, you know, this refreshes your memory or if you</p> <p>2 believe it's possible that these three businesses -- I</p> <p>3 mean, these three homes that you had a lease with</p> <p>4 Jubilee that you were a party to the lease; is that</p> <p>5 correct?</p> <p>6 A. So let me understand. Is it saying that for</p> <p>7 Belfast I owe? Is all of these ones as well? Is it</p> <p>8 just only Belfast?</p> <p>9 Q. It looks like --</p> <p>10 A. It looks like only Belfast.</p> <p>11 MR. WILLIAMS: It looks like these three,</p> <p>12 it looks like.</p> <p>13 Q. (BY MS. PAGE) Do you recall an address with</p> <p>14 Wolfe?</p> <p>15 A. Oh, yeah. Yeah, I recall those names. So it's</p> <p>16 saying these three homes, right --</p> <p>17 Q. Right.</p> <p>18 A. -- were in my name?</p> <p>19 Q. I'm asking you.</p> <p>20 A. Yeah. Yes, I agree.</p> <p>21 Q. I mean --</p> <p>22 A. Yeah.</p> <p>23 MR. WILLIAMS: If you remember, now.</p> <p>24 A. Oh, I do remember. Like I say, I remember that</p> <p>25 I know some of those homes were bought in my name, and</p>
Page 30	Page 32
<p>1 says Page 15 of 34. Does this refresh your memory of</p> <p>2 the properties that were in your name?</p> <p>3 A. So like Belfast was in my name, I guess.</p> <p>4 Q. I don't know.</p> <p>5 A. Or was it? I think -- you know, like I said,</p> <p>6 some are in my name. So if it says --</p> <p>7 THE WITNESS: Is that what that says,</p> <p>8 Belfast?</p> <p>9 MR. WILLIAMS: That's what this is saying.</p> <p>10 THE WITNESS: Oh, yeah. So, yes.</p> <p>11 MR. WILLIAMS: Is it permissible to explain</p> <p>12 to her what this is, what she's looking at, so she</p> <p>13 can --</p> <p>14 MS. PAGE: I'll explain it.</p> <p>15 MR. WILLIAMS: Okay. Good enough.</p> <p>16 Q. (BY MS. PAGE) Okay. So this here is a schedule</p> <p>17 to the bankruptcy petition that was filed by Jubilee,</p> <p>18 and it's showing all of the leases or contracts that</p> <p>19 Jubilee had --</p> <p>20 A. Okay.</p> <p>21 Q. -- and the parties that it had the leases or</p> <p>22 contracts with. And so this is -- this was filed in the</p> <p>23 bankruptcy by Jubilee. Okay. So the first -- that's</p> <p>24 what this is.</p> <p>25 And if you can just look through here and</p>	<p>1 this will be correct.</p> <p>2 Q. (BY MS. PAGE) Okay. And then Mr. Ulasi also</p> <p>3 had some leases with Jubilee. See below that there's a</p> <p>4 Bassford Drive and a Clint in Beaumont?</p> <p>5 A. Uh-huh.</p> <p>6 Q. Would these addresses be homes that --</p> <p>7 A. Oh, yes. All of these are homes that we will</p> <p>8 put the clients in, yes.</p> <p>9 Q. Okay.</p> <p>10 A. And, I mean, I remember those addresses.</p> <p>11 Q. Okay. And Eduardo Vivanco, do you know who</p> <p>12 that is?</p> <p>13 A. I think he is our manager in McAllen. And I'm</p> <p>14 not 100 percent sure. Is that address McAllen or</p> <p>15 is that -- no, it's Houston. I don't know who that is</p> <p>16 if that's Houston. I don't know who that is at all.</p> <p>17 Q. Okay. So the next page, Page 16, it lists</p> <p>18 three -- the bankruptcy, the schedule lists three</p> <p>19 properties, Spring Grove, Houston; Hidden Valley,</p> <p>20 Beaumont; Victoria Park, Corpus Christi with</p> <p>21 Michael Umeorah being a party to this.</p> <p>22 A. Okay.</p> <p>23 Q. Does that sound --</p> <p>24 A. Uh-huh.</p> <p>25 Q. -- correct or possible?</p>

<p style="text-align: right;">Page 33</p> <p>1 A. Yeah.</p> <p>2 Q. So Spring Grove, would that be a home that you</p> <p>3 placed clients in?</p> <p>4 A. It was a home to start with, I believe. Yeah,</p> <p>5 it was a home and also an office.</p> <p>6 Q. So did your husband own this property,</p> <p>7 Spring Grove?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Does he still own it?</p> <p>10 A. Uh-uh. No.</p> <p>11 Q. No?</p> <p>12 A. It was foreclosed.</p> <p>13 Q. Okay. It was foreclosed when? Do you know</p> <p>14 when it was foreclosed?</p> <p>15 A. I was already back here. I'm not sure of the</p> <p>16 date now.</p> <p>17 Q. So how long did -- was this the office for</p> <p>18 Jubilee from the beginning?</p> <p>19 A. Oh, no. No. From the beginning, Jubilee had</p> <p>20 another office. And I've forgotten the address, but</p> <p>21 it's on Southwest Freeway.</p> <p>22 Q. And then where did it move next?</p> <p>23 A. I believe from there -- I'm not 100 -- I think</p> <p>24 from there it went to Spring Grove. I am not sure now</p> <p>25 if it went somewhere else before Spring Grove.</p>	<p style="text-align: right;">Page 35</p> <p>1 Q. But -- but Nina would be the owner of these</p> <p>2 homes; correct?</p> <p>3 A. She bought the homes, yes.</p> <p>4 Q. So they would pay the rent to Nina?</p> <p>5 A. I mean, but remember now, the company --</p> <p>6 Jubilee will collect those monies from the clients and</p> <p>7 pay.</p> <p>8 Q. Okay. But Nina would receive some rent because</p> <p>9 you said before that you didn't receive any rent?</p> <p>10 A. Nina didn't receive any either. You know, the</p> <p>11 rent -- this is how it works. So we bought it, rented</p> <p>12 our home. The house in our names, right, and every</p> <p>13 month -- there can only be three clients. The clients</p> <p>14 will pay the company for room and board. So they will</p> <p>15 pay whatever is assessed them. Depending on how many</p> <p>16 are there, they will pay that amount of money. It's</p> <p>17 supposed to cover room and board. They will pay into</p> <p>18 the company, and from there the company will pay the</p> <p>19 mortgage.</p> <p>20 Q. For whoever owned the property?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So these three -- Belfast -- I'm back on</p> <p>23 Page 15 -- the Belfast address or home, the Wolfe home</p> <p>24 and the Keystone home, at some point they were in your</p> <p>25 name?</p>
<p style="text-align: right;">Page 34</p> <p>1 Q. And now where is it? Did it -- after</p> <p>2 Spring Grove, where did the office move?</p> <p>3 A. Beaumont. So the office is basically in</p> <p>4 Beaumont, the part of the company that's still open.</p> <p>5 Q. What's the address in Beaumont?</p> <p>6 A. I don't know, but Michael would know. I've</p> <p>7 been there, but Michael will know the address.</p> <p>8 Q. And then Nina -- below that, there's four</p> <p>9 properties, Emily, Elk Drive, Mountainview, Flagstaff.</p> <p>10 Those are the street names. Do you recognize those</p> <p>11 names?</p> <p>12 A. I do.</p> <p>13 Q. And what are those?</p> <p>14 A. All of these are homes. These ones are all</p> <p>15 homes in those places as well where we kept -- you know,</p> <p>16 where clients lived.</p> <p>17 Q. And did Jubilee pay rent, or were there rent</p> <p>18 to -- in regards to these homes?</p> <p>19 A. You know, there's a way business runs. Like</p> <p>20 the clients are supposed to pay their own rent. So the</p> <p>21 clients pay their rent. That's how it's supposed to be.</p> <p>22 But I know that Jubilee -- some of the clients didn't</p> <p>23 have enough money that Jubilee would pay. So --</p> <p>24 Q. But who would they pay, Nina?</p> <p>25 A. Oh, no. They would pay the mortgage company.</p>	<p style="text-align: right;">Page 36</p> <p>1 A. (Witness nodding head.)</p> <p>2 Q. And --</p> <p>3 A. Yes.</p> <p>4 Q. -- do you know when -- were they sold, or what</p> <p>5 happened to these three pieces of property?</p> <p>6 A. By the time these were happening, I had left.</p> <p>7 I wasn't -- I wasn't part of the business in terms of</p> <p>8 running it, you know. So when they were sold, I was</p> <p>9 already in Nigeria. When they were foreclosed and all</p> <p>10 of that, I wasn't even here. I wasn't even aware of the</p> <p>11 bankruptcy either.</p> <p>12 Q. Do you -- do you know if they were sold or</p> <p>13 foreclosed, these three?</p> <p>14 MR. WILLIAMS: If you know. Just what you</p> <p>15 know.</p> <p>16 A. I know. You know, because sometimes I'll get</p> <p>17 notices about the foreclosures. So I know, but I can't</p> <p>18 specifically now say this was sold or this was</p> <p>19 foreclosed. I think they were mainly foreclosed.</p> <p>20 Q. (BY MS. PAGE) Okay.</p> <p>21 A. I don't believe they were sold, but then I</p> <p>22 can't -- I can't swear to that. I believe they were</p> <p>23 foreclosed.</p> <p>24 MR. WILLIAMS: Just answer what you know.</p> <p>25 A. That's what I'm saying. I'm saying -- I'm just</p>

<p style="text-align: right;">Page 37</p> <p>1 saying you -- telling you what I know.</p> <p>2 Q. (BY MS. PAGE) I think you said that at some</p> <p>3 point -- well, the only office that's left is Beaumont.</p> <p>4 Why did the other divisions or branches close?</p> <p>5 A. Corpus Christi closed -- I had already left,</p> <p>6 but Michael was still there, so he was part of the</p> <p>7 closing. It closed because the principal officer that</p> <p>8 we employed that was handling that branch, we had found</p> <p>9 one thing.</p> <p>10 Q. Found what?</p> <p>11 A. One -- they had gone in and started meddling</p> <p>12 with the funds of the clients.</p> <p>13 Q. Now, who were these people?</p> <p>14 A. Debbie Hovda and Victor -- I forgot his last</p> <p>15 name.</p> <p>16 Q. And Victor?</p> <p>17 A. Yes. I've just forgotten Victor's last name</p> <p>18 now. But Michael was there as it was winding down.</p> <p>19 Q. And when did you say Michael went back to</p> <p>20 Nigeria?</p> <p>21 A. 2006.</p> <p>22 Q. Do you know why the company filed bankruptcy?</p> <p>23 A. No, because I had left. I wasn't here. I</p> <p>24 wasn't part of the -- I didn't know what was going on in</p> <p>25 the company then, and I wasn't being informed either.</p>	<p style="text-align: right;">Page 39</p> <p>1 Houston.</p> <p>2 Q. Okay.</p> <p>3 A. So I wasn't the nurse. They hired other</p> <p>4 nurses. Like in Corpus Christi, Beaumont, McAllen had</p> <p>5 nurses that they hired.</p> <p>6 Q. So did you have an office at the main office?</p> <p>7 I'm assuming that was at --</p> <p>8 A. Southwest Freeway.</p> <p>9 Q. Southwest Freeway?</p> <p>10 A. I forgot the address. I think it's something</p> <p>11 something Southwest Freeway.</p> <p>12 Q. So you had an office there?</p> <p>13 A. (Witness nodding head.)</p> <p>14 Q. And would you say you worked there 40 hours a</p> <p>15 week or --</p> <p>16 A. (Witness nodding head.)</p> <p>17 Q. So it was a full-time job?</p> <p>18 A. Yes. Oh, yes. I forgot. Yes.</p> <p>19 Q. And that time period -- oh, my goodness. When</p> <p>20 did -- did you and your husband eventually sell the</p> <p>21 store?</p> <p>22 A. As my husband was leaving, 2006, he sold it.</p> <p>23 Q. Okay. So how long were you -- you were a</p> <p>24 full-time nurse -- I'm sorry. I need to go back. Let's</p> <p>25 see here.</p>
<p style="text-align: right;">Page 38</p> <p>1 Q. So you weren't aware of the bankruptcy until</p> <p>2 now?</p> <p>3 A. No. I learned way after the fact.</p> <p>4 Q. Did the company have problems with payroll</p> <p>5 taxes when you were -- prior to you moving to Nigeria?</p> <p>6 A. I believe so. But, you know, they were</p> <p>7 making -- they were being paid but not when due, and I</p> <p>8 know there were issues. But, you know, it was being</p> <p>9 paid not as when due but being paid.</p> <p>10 Q. Okay. What were your duties at Jubilee?</p> <p>11 A. At the time that I was at Jubilee, I was like</p> <p>12 the primary nurse.</p> <p>13 Q. Did you receive a salary?</p> <p>14 A. Yes.</p> <p>15 Q. And which divisions did you work at?</p> <p>16 A. Oh, here in Houston.</p> <p>17 Q. So you were at the main office?</p> <p>18 A. Yes. But, I mean, I was -- yeah.</p> <p>19 Q. Main office?</p> <p>20 A. Yeah. But I would still oversee, you know, the</p> <p>21 other parts. I would still talk to them, or they could</p> <p>22 still call me for questions and stuff.</p> <p>23 Q. You would oversee --</p> <p>24 A. Like Corpus Christi could call me. Any one of</p> <p>25 them could call me, but I mainly saw the patients in</p>	<p style="text-align: right;">Page 40</p> <p>1 So you were a full-time nurse when Jubilee</p> <p>2 opened up until you left, a full-time nurse for Jubilee?</p> <p>3 A. Oh, no, I wasn't. Even before I left, I had</p> <p>4 stopped running that part of Jubilee. They had another</p> <p>5 nurse. I had even stopped going to the office.</p> <p>6 Q. And when was that? Why?</p> <p>7 A. You know, I think we decided to like kind of</p> <p>8 leave the business for the men to do at some point in</p> <p>9 there. I don't know whether it was 2001 or '2, you</p> <p>10 know, they hired another nurse. I had stopped going to</p> <p>11 the office like, you know, working there full-time. I</p> <p>12 was just doing my own thing. When was that? Anyway,</p> <p>13 before I left. So in there, in 2001 or '2 or '3 -- I'm</p> <p>14 not sure now -- but they hired another nurse, and I had</p> <p>15 stopped going and working there full-time and I started</p> <p>16 doing my own things. I'm not sure which, but it's right</p> <p>17 there anywhere from 1999 or anywhere from -- actually,</p> <p>18 anywhere from 2001 to 2004, before I left, I had stopped</p> <p>19 working for Jub -- you know, I had stopped like going</p> <p>20 there and being there, not day-to-day running.</p> <p>21 Q. So when you -- when you came back for the</p> <p>22 periods that you were working as a contract nurse, did</p> <p>23 you work at Jubilee also while you were back?</p> <p>24 A. No. I -- once I left Jubilee, like working for</p> <p>25 them in that 2001 or 2002, I never worked there as a</p>

<p style="text-align: right;">Page 41</p> <p>1 nurse. And then even when I came back, like when I was</p> <p>2 in Nigeria visiting, I didn't even know where their</p> <p>3 office was or what was going on, nothing.</p> <p>4 Q. And you weren't -- the other three didn't call</p> <p>5 you or visit with you about what was happening at</p> <p>6 Jubilee?</p> <p>7 A. Chris will be the only one I would talk to, but</p> <p>8 I didn't talk to him much. I didn't even -- I could</p> <p>9 come and stay the whole three months, I didn't even see</p> <p>10 him. So -- and when I talked to him, you know, he would</p> <p>11 just say the company is there. So I didn't have much</p> <p>12 communication when I came back. Probably none with</p> <p>13 Nina, not even a phone call. And then maybe sometimes I</p> <p>14 will come, the whole three months I wouldn't see Chris</p> <p>15 or talk to him or, you know, maybe I talked to him one</p> <p>16 time. I wouldn't even know what was going on, where the</p> <p>17 office was. I wouldn't go to the office there.</p> <p>18 Q. So now when you came back, what were your</p> <p>19 duties?</p> <p>20 A. When I came back in 2012, I was still -- you</p> <p>21 know, now I've got another PRN job, and I don't know if</p> <p>22 I mentioned that one. I started working for Texas</p> <p>23 Specialty Hospital when I came back in 2012. When I</p> <p>24 came back, I worked for an agency a little bit, and then</p> <p>25 I got a full -- I was actually working like seven 16s at</p>	<p style="text-align: right;">Page 43</p> <p>1 So when I came back in 2012, I started to</p> <p>2 look deeper. So when I know the company was there and</p> <p>3 running, I now started making an effort to get back and</p> <p>4 at least to know what is going on. But it was resisted.</p> <p>5 Q. By who?</p> <p>6 A. Chris.</p> <p>7 Q. Why?</p> <p>8 A. I don't know.</p> <p>9 Q. How -- how did he resist it?</p> <p>10 A. I wanted -- you know, I asked questions. I</p> <p>11 wouldn't get answers. I now wanted to see where our</p> <p>12 account is, where is our account lodged, that I wanted</p> <p>13 to get access to look at the accounts and see what's</p> <p>14 going on. By that time he had closed -- I think while</p> <p>15 we left he closed all the accounts that had our names,</p> <p>16 opened one that didn't have our names.</p> <p>17 Q. When you came back in 2012, did your husband</p> <p>18 and son come back with you?</p> <p>19 A. My son came back with me, but my husband was in</p> <p>20 Nigeria. My son came back and started school, but my</p> <p>21 husband was in Nigeria.</p> <p>22 Q. And where did your son start school?</p> <p>23 A. I first sent him on The Honor Roll School, and</p> <p>24 then he went to Fort Settlement Middle School.</p> <p>25 Q. Fort Settlement, where is that?</p>
<p style="text-align: right;">Page 42</p> <p>1 Texas Specialty Hospital, and I worked for them. I</p> <p>2 worked full-time. I was there every day. At the time I</p> <p>3 was working seven 16 hours. So I was working for Texas</p> <p>4 Specialty at that time, you know.</p> <p>5 Q. And you came back the 2012?</p> <p>6 A. Uh-huh. And I started working for -- I was</p> <p>7 working at the hospital. I was using my registered</p> <p>8 nurse license to work.</p> <p>9 Q. And at what time did you return to Jubilee or</p> <p>10 have any -- any duties or responsibilities at Jubilee?</p> <p>11 A. So now after I came back to the country and I</p> <p>12 was working, you know, privately. So I started -- just</p> <p>13 being in the community, I started having this feeling</p> <p>14 that Jubilee was there and was not doing poorly like was</p> <p>15 being portrayed. So I started wanting to get back and</p> <p>16 be part of the business, but it was resisted.</p> <p>17 Q. So you said you thought it was being poorly</p> <p>18 portrayed?</p> <p>19 A. No. While we were in Nigeria, right, I know my</p> <p>20 husband would call Chris and ask him about the company,</p> <p>21 and he would say, oh, you know, the company wasn't --</p> <p>22 you know, was barely making it, he's trying to run it</p> <p>23 the best he can and all that, but hedging, hedging, kind</p> <p>24 of not being fully disclosing. But then you remember,</p> <p>25 we were outside.</p>	<p style="text-align: right;">Page 44</p> <p>1 A. Sugar Land.</p> <p>2 Q. And what year was that he started? Did he --</p> <p>3 A. When we came, first he went to Honor Roll</p> <p>4 School.</p> <p>5 Q. And that's --</p> <p>6 A. In Sugar Land as well, close to our house. So</p> <p>7 he went there.</p> <p>8 Q. Is that an elementary school?</p> <p>9 A. Yeah.</p> <p>10 Q. Okay.</p> <p>11 A. And then he -- it was elementary school, but I</p> <p>12 think he started seventh grade there. That's middle</p> <p>13 school. So it was middle -- it had both elementary and</p> <p>14 middle school. It doesn't have high school. But then</p> <p>15 when he moved, he moved from there and then went to the</p> <p>16 school in our district. He went to Fort Settlement</p> <p>17 Middle School, and I believe either in 2012 or 2013 he</p> <p>18 transferred over to Fort Settlement.</p> <p>19 Q. What year was he born?</p> <p>20 A. 2000.</p> <p>21 Q. Why didn't your husband come back with you in</p> <p>22 2012?</p> <p>23 A. He was there trying to make a headway, you</p> <p>24 know, make a headway of things in Nigeria.</p> <p>25 Q. "Things" being what?</p>

Page 45	Page 47
<p>1 A. Being, you know, the business we had started.</p> <p>2 It wasn't doing well.</p> <p>3 Q. The noodle company?</p> <p>4 A. Uh-huh. He was trying to see if he could get</p> <p>5 it to work still.</p> <p>6 Q. Okay. What would you say that your husband's</p> <p>7 job description or duties were with Jubilee?</p> <p>8 A. When?</p> <p>9 Q. During the period -- really, I don't know if</p> <p>10 they changed, but from the beginning of the company,</p> <p>11 which is in the late '90s, until now.</p> <p>12 A. So when it started, you know, my husband was</p> <p>13 one of the directors. So was Chris. But my husband</p> <p>14 also had Angel's Food Industries that he -- Angel's Food</p> <p>15 Stores that -- you know, we still had that business. So</p> <p>16 he was running it. So he will come in and out of the</p> <p>17 office but -- as a director. But at that time, as I</p> <p>18 remember, he didn't -- you know, he would come, he would</p> <p>19 work; but, you know, I don't really know what I would</p> <p>20 call his position except for like a director in the</p> <p>21 company.</p> <p>22 Q. Was he -- was he running the company?</p> <p>23 A. At that time, no. The company was -- of the</p> <p>24 four of us, Nina is the one that has like an accounting</p> <p>25 degree. She did more of the running of the company,</p>	<p>1 on. So we decided to pull, and we did pull. And that</p> <p>2 is somewhere -- and I don't know exactly now -- before I</p> <p>3 left. Either 2001, 2002, 2003, that short time there.</p> <p>4 By that time we were no longer in Southwest Freeway.</p> <p>5 Q. Now you're at Spring Grove?</p> <p>6 A. You know, we moved to Spring Grove, but</p> <p>7 Spring Grove was -- doesn't exist anymore.</p> <p>8 Q. Okay. But the time that you --</p> <p>9 A. Yes. Yes. Yes. We had moved to Spring Grove,</p> <p>10 yes. So some point between 1999 and 2003, '4, myself</p> <p>11 and Nina had pulled back, not -- our names were there,</p> <p>12 but we had pulled back and it was Chris and Michael.</p> <p>13 Q. When you pulled -- you just didn't go to the</p> <p>14 office as much or --</p> <p>15 A. We didn't even go.</p> <p>16 Q. And was that a decision made by someone, or did</p> <p>17 it just happened?</p> <p>18 A. We made -- no. That decision was made.</p> <p>19 Q. By all four of you?</p> <p>20 A. All four of us, yes.</p> <p>21 Q. All four of you got together and said --</p> <p>22 A. For the interest of peace, the women should</p> <p>23 just pull back.</p> <p>24 Q. For the interest of what?</p> <p>25 A. Peace. And, you know, so just -- yes, the</p>
Page 46	Page 48
<p>1 themselves running it. I was the nurse, but I was also</p> <p>2 there. Chris would also come in, but he was also</p> <p>3 teaching full-time. But then --</p> <p>4 Q. So what was your husband's duties or what did</p> <p>5 he do? Did he make decisions for the company?</p> <p>6 A. The decisions was mainly jointly made at that</p> <p>7 time. I wouldn't say that any one particular person</p> <p>8 made all the decisions.</p> <p>9 Q. Okay. At what time are you talking about?</p> <p>10 A. I mean, like at the beginning.</p> <p>11 Q. Until?</p> <p>12 A. Until he left. Until he left.</p> <p>13 Q. Okay.</p> <p>14 A. But before Michael left, right, there was a</p> <p>15 time me and Nina pulled out, mostly pulled out. That</p> <p>16 was between -- remember the time I told you I can't</p> <p>17 remember correctly, that 2001 and 2004, somewhere in</p> <p>18 there myself and Nina pulled back. We pulled back, and</p> <p>19 it was mainly Michael and Chris.</p> <p>20 Q. That ran the business?</p> <p>21 A. Yes. Yes.</p> <p>22 Q. Or were the -- you know, made all the</p> <p>23 decisions?</p> <p>24 A. Yeah. At some point, you know, because, also,</p> <p>25 me and Nina were having some internal female stuff going</p>	<p>1 women should pull back.</p> <p>2 Q. Had something happened or what --</p> <p>3 A. Like I said, you know, we were not agreeing.</p> <p>4 Q. On how the business should run?</p> <p>5 A. No. Yeah -- no. It was also personal --</p> <p>6 Q. Okay.</p> <p>7 A. -- personal you would call it. Personal</p> <p>8 conflicts that, you know, it was -- you know, so we just</p> <p>9 said it was better we move out a little bit and leave</p> <p>10 the men.</p> <p>11 Q. Did Nina have any other job during this -- the</p> <p>12 time period -- really, I'm more interested in</p> <p>13 December 2003 to March 2015. That's the periods at</p> <p>14 issue here, are the --</p> <p>15 A. From what time to what time?</p> <p>16 Q. The end of 2003 to the beginning of March -- I</p> <p>17 mean, beginning 2015.</p> <p>18 A. Yeah, she had another business.</p> <p>19 Q. She had another business?</p> <p>20 A. Yes.</p> <p>21 Q. What was that?</p> <p>22 A. And, also, it was -- it's a business kind of</p> <p>23 like mentally retarded but a different level. They call</p> <p>24 it ICF/MR, and I might not be right. You know, ours is</p> <p>25 like mentally retarded people. But before that waiver</p>

<p style="text-align: right;">Page 49</p> <p>1 was found, there was another waiver that dealt with, you</p> <p>2 know, children that were like just vegetative kind of</p> <p>3 state. It was called ICF/MR. They phased it out,</p> <p>4 but -- you know, they phased it out, but she had bought</p> <p>5 that business from somebody.</p> <p>6 Q. Okay.</p> <p>7 A. ICF/MR. You know, it's also dealing with</p> <p>8 mentally retarded people like where you keep them in</p> <p>9 homes; right?</p> <p>10 Q. So it was another business that had to do with</p> <p>11 placing people in homes?</p> <p>12 A. Uh-huh.</p> <p>13 Q. And she --</p> <p>14 A. Bought that business from somebody and owned</p> <p>15 it.</p> <p>16 Q. During this time period?</p> <p>17 A. That period that you're talking about --</p> <p>18 Q. 2002 or 2003?</p> <p>19 A. -- after we pulled back. Uh-huh.</p> <p>20 Q. Okay. Do you know what the name of the</p> <p>21 business was?</p> <p>22 A. No.</p> <p>23 Q. Does she still have that business?</p> <p>24 A. Uh-huh.</p> <p>25 Q. She does?</p>	<p style="text-align: right;">Page 51</p> <p>1 Q. The same waiver?</p> <p>2 A. Yes, it's the same program.</p> <p>3 Q. Okay.</p> <p>4 A. You can call it program.</p> <p>5 Q. And so the Beaumont program is still going on,</p> <p>6 or waiver, and --</p> <p>7 A. It's still a program. Let's maybe leave</p> <p>8 waiver. It's a still a program of mental health and</p> <p>9 mental retardation. It's still a program.</p> <p>10 Q. How many employees does Jubilee have now?</p> <p>11 A. I don't know. I don't know how many employees</p> <p>12 Jubilee has. Michael would know.</p> <p>13 Q. Okay. Who is Dominic O. Amaugwu?</p> <p>14 A. That's our law office -- not law office,</p> <p>15 accountant.</p> <p>16 Q. Okay. Presently?</p> <p>17 A. Yes.</p> <p>18 Q. How long -- it's Jubilee's accountant --</p> <p>19 A. Yes.</p> <p>20 Q. -- correct?</p> <p>21 A. Yes.</p> <p>22 Q. How long has he been Jubilee's accountant?</p> <p>23 A. Since I came back, you know, he's been our</p> <p>24 accountant. I'm not sure exactly when it was Chris.</p> <p>25 When we were away, I think it was Chris that will answer</p>
<p style="text-align: right;">Page 50</p> <p>1 A. Uh-huh.</p> <p>2 Q. Okay. Who else is involved in that business?</p> <p>3 A. (Witness shrugging shoulders.)</p> <p>4 Q. You don't know?</p> <p>5 A. Uh-huh.</p> <p>6 Q. Okay.</p> <p>7 A. I mean, you know, I don't know how to the</p> <p>8 extent that the husband is involved or not involved.</p> <p>9 Q. Who is Arvy McKinney?</p> <p>10 A. Arvy is our manager at Beaumont.</p> <p>11 Q. And how long has she been the manager there?</p> <p>12 A. From the beginning of that waiver, of that</p> <p>13 Beaumont.</p> <p>14 Q. When you say "waiver," what do you mean?</p> <p>15 A. It's what they call it. It's like a waiver,</p> <p>16 like the state government and the federal government,</p> <p>17 it's like a program that is established and funded for a</p> <p>18 particular purpose. And it's done through mental health</p> <p>19 and mental retardation, the health services department</p> <p>20 from Austin.</p> <p>21 Q. So the waiver in Beaumont could also be just</p> <p>22 called the program?</p> <p>23 A. It's part of -- it's part of the Jubilee. It's</p> <p>24 the same. The one in Beaumont, Houston, Corpus Christi,</p> <p>25 McAllen is the same.</p>	<p style="text-align: right;">Page 52</p> <p>1 that question the best. He's the one that got him in</p> <p>2 when he was the only one running the company.</p> <p>3 Q. What about Jackie D. Bell?</p> <p>4 A. Jackie D. Bell?</p> <p>5 Q. Do you know her?</p> <p>6 A. Is it him? If that's the same one, there was a</p> <p>7 Jackie D. Bell that used to work for Jubilee as a</p> <p>8 caregiver a long time ago. And I say he. That's a</p> <p>9 woman, and I'm not 100 percent sure.</p> <p>10 Q. What about Andra R. Harris, do you know who</p> <p>11 that is?</p> <p>12 A. No.</p> <p>13 Q. Okay. During the period at issue, which is</p> <p>14 December 2003 to March 2015 --</p> <p>15 A. I'm going to right that date down. All right.</p> <p>16 Between 2003.</p> <p>17 Q. 2003 to 2015 --</p> <p>18 A. All right.</p> <p>19 Q. -- how was payroll handled?</p> <p>20 A. I don't know.</p> <p>21 Q. Okay. How was payroll handled prior to 2004?</p> <p>22 A. Prior to 2004, I believe Michael and Chris, who</p> <p>23 I think they had a QuickBooks, and they would do the</p> <p>24 payroll from my remember -- from what I remember.</p> <p>25 Q. Okay. Did you ever prepare payroll?</p>

Page 53

1 **A. Never.**
2 Q. Were you authorized to prepare payroll?
3 **A. I never asked to be auth -- I mean, I don't**
4 **know who would authorize me if I wanted -- no, I wasn't**
5 **authorized. I didn't do payroll or the part of payroll.**
6 Q. And did you ever make tax -- payroll tax
7 deposits?
8 **A. Uh-uh. Never.**
9 Q. Who made the payroll tax -- during this
10 period --
11 **A. I mean, the period I wasn't part of Jubilee, I**
12 **didn't know what was happening.**
13 Q. Okay. Well, during the period that you know.
14 **A. During the period I know, honestly, I don't**
15 **know because I wasn't part of that process to know who**
16 **paid it, whether it was accountants. I don't know. I**
17 **wasn't part of that department. I was mainly more into**
18 **nursing for the clients.**
19 Q. Do you know who cut the paychecks, who prepared
20 the paychecks?
21 **A. At that time, before 2003?**
22 MR. WILLIAMS: Yes.
23 **A. Maybe Chris or Michael or both of them.**
24 Q. (BY MS. PAGE) Okay. So you don't know?
25 **A. I don't know. I don't know, honestly.**

Page 54

1 MR. WILLIAMS: It's okay to say you don't
2 know.
3 **A. I don't know. I don't remember. I don't**
4 **really remember, honestly.**
5 Q. (BY MS. PAGE) And I think you said you did
6 receive a paycheck?
7 **A. Yes, I did.**
8 Q. For --
9 **A. I was a director, and I was actually doing the**
10 **nursing part of that business at that time.**
11 Q. Did the directors receive a paycheck?
12 **A. Yes.**
13 Q. And was it a set amount, or how was that
14 determined?
15 **A. I don't remember. I don't remember.**
16 Q. Okay. But you do recall before you left that
17 there were problems with the payroll, deposits of
18 payroll taxes?
19 **A. I know that they were delayed. I know they**
20 **were being paid, but they were not being paid all the**
21 **time when due. I know there were issues, but they were**
22 **being paid.**
23 Q. Did Jubilee ever not make payroll, was not able
24 to pay the employees?
25 **A. I don't believe so.**

Page 55

1 Q. Where did the startup money for Jubilee come
2 from?
3 **A. The four of us contributed.**
4 Q. Do you remember how much you contributed?
5 **A. I don't remember.**
6 Q. Was it equal?
7 **A. Yes.**
8 Q. Did Jubilee ever have any investors?
9 **A. No.**
10 Q. Are you aware of a duty to deposit payroll
11 taxes?
12 **A. Honestly, at the beginning of this business,**
13 **when I was part of it, I have not done this before. You**
14 **know, it came to me. I became aware of it, but I didn't**
15 **know to what extent. I didn't know all of this.**
16 Q. Do you know when you became aware?
17 **A. When there started being issues, when there**
18 **were issues, and, you know, when the IRS kept calling**
19 **us. When I came back, they're calling me more so.**
20 Q. Were you aware before you left that there were
21 payroll tax deposit problems?
22 **A. Before I left, I wasn't aware, you know,**
23 **that -- how will I put it? I know that we were paying**
24 **taxes. I know we were not paying it exactly the way we**
25 **do now. Like now, every two weeks we pay it. We didn't**

Page 56

1 **even know that was how to do it. I didn't know. So,**
2 **no, I didn't know, you know, the exact way I know now.**
3 **I know more now than I did then. Now I know the issues,**
4 **how it's supposed to be done. At that time, I had no**
5 **clue.**
6 Q. Okay. So when you -- when did you -- when were
7 you aware of the issues and the duty to deposit payroll
8 taxes?
9 **A. When I came back. That's when I got into it,**
10 **when I came back.**
11 Q. Did Jubilee have a bookkeeper?
12 **A. In-house?**
13 Q. In-house.
14 **A. That was Nina's department. We didn't hire**
15 **anybody like to be -- that I remember, in-house to be an**
16 **accountant in-house. I don't remember. We didn't hire**
17 **anybody, to best of my remembrance. And I could be**
18 **wrong. As a matter of fact, I could be wrong. Whether**
19 **we had somebody in-house keeping books, I don't**
20 **remember. We always had external accountants, you know.**
21 **But they were not accountants in Jubilee, but they were**
22 **like external.**
23 Q. Where were the checkbooks kept, at the office?
24 **A. I think so. I'm not sure. Probably, most**
25 **likely.**

Page 57	Page 59
<p>1 MR. WILLIAMS: Just --</p> <p>2 A. I don't know. I don't remember. I don't know.</p> <p>3 Q. (BY MS. PAGE) Where are they kept now?</p> <p>4 A. Right now the accountant, the accountant has</p> <p>5 the checkbooks. We also have checkbooks.</p> <p>6 Q. "We" being?</p> <p>7 A. Michael, Chris, me, because sometimes we make</p> <p>8 payments. You know, there are some payments we make.</p> <p>9 Q. What kind of payments do you-all make?</p> <p>10 A. Like if they're coming to see the dentist and</p> <p>11 we -- you know, from Beaumont, they come to see the</p> <p>12 dentist, sometimes I will go there and write a check for</p> <p>13 the dentist or Michael will go or, you know, Chris will</p> <p>14 go. But especially now, Michael does more than</p> <p>15 everybody else in terms of, you know, making payments.</p> <p>16 Q. You mean making payments for the patients?</p> <p>17 A. Different like -- it's different things he make</p> <p>18 payments for, different things. Just the things like is</p> <p>19 involved in running a business.</p> <p>20 Q. Do you have the authority to hire and fire?</p> <p>21 A. No.</p> <p>22 Q. Did you ever hire anyone?</p> <p>23 A. No.</p> <p>24 Q. You didn't hire Arvy McKinney?</p> <p>25 A. No. But I think the four of us interviewed</p>	<p>1 Which one is 941?</p> <p>2 Q. Form 941 is the payroll tax, tax return.</p> <p>3 A. Okay. The one that the accountant gives us</p> <p>4 every two weeks, like after we pay our employees, what</p> <p>5 we get back; right?</p> <p>6 Q. I'm not sure about that.</p> <p>7 MR. WILLIAMS: Look, don't speculate.</p> <p>8 A. I don't know. I don't know what it is. I only</p> <p>9 know 1099. I don't know what any one of those --</p> <p>10 Q. (BY MS. PAGE) Have you ever signed a tax</p> <p>11 return -- any kind of tax return for Jubilee?</p> <p>12 A. I don't know. The truth is this: When I came</p> <p>13 back in 2000 -- when my name got back into the company,</p> <p>14 right, when my name got back into there and I started</p> <p>15 being involved with the tax issues, there were things I</p> <p>16 signed and payments I made to IRS. I even went to the</p> <p>17 IRS office. The IRS had appointed somebody that was</p> <p>18 overseeing our taxes. If they gave me anything at that</p> <p>19 point to sign, I would have signed it after I came back.</p> <p>20 So I don't want to say no and I would have</p> <p>21 signed something. Because I directly pulled money, you</p> <p>22 know, wrote IRS checks, mailed them, went to the office</p> <p>23 to see the IRS person at the main office. I could have</p> <p>24 signed something that was -- anything that was for</p> <p>25 Jubilee if payments needed to be made, I could have</p>
Page 58	Page 60
<p>1 him -- sorry, the four of us interviewed her. At that</p> <p>2 beginning time, when we were fully in there, we would</p> <p>3 all jointly hire or talk to a prospective applicant.</p> <p>4 Q. What about now?</p> <p>5 A. Oh, no. It's different now. I mean, since I</p> <p>6 came back, and even when I left, you know, whenever I</p> <p>7 told you I kind of pulled back from the company, 2001,</p> <p>8 2002, in there, you know, since that time, I wasn't no</p> <p>9 longer involved in the hiring or firing or anything like</p> <p>10 that, no.</p> <p>11 Q. Did one of the four of you write checks to</p> <p>12 creditors for bills? There had to be bills, Jubilee had</p> <p>13 bills?</p> <p>14 A. Yeah. At that time we could all write checks.</p> <p>15 Q. "At that time" being?</p> <p>16 A. You know, before 2000 -- before 2003, right, we</p> <p>17 could all write checks. And even after I came back, I</p> <p>18 could write checks. I was paying the IRS. I was --</p> <p>19 when I came back and my name -- once my name got back</p> <p>20 into the account, I was writing checks. I started</p> <p>21 writing checks whenever my name came back into the</p> <p>22 account and I was again involved with the business.</p> <p>23 Q. Do you know what a Form 941 is?</p> <p>24 A. 941? I'm not too familiar with the</p> <p>25 different -- you know, I know 1099, because I get those.</p>	<p>1 signed it.</p> <p>2 Q. And that was during specifically what period?</p> <p>3 A. Whenever I came back and decided we needed to</p> <p>4 go back into the company and see what's going on, and we</p> <p>5 forced our way into getting our names signed onto the --</p> <p>6 being, what you call, signature to the account.</p> <p>7 Q. So you would say as soon as you got signature</p> <p>8 authority?</p> <p>9 A. Exactly. As far as being involved and writing</p> <p>10 checks and making payments, and I could have signed</p> <p>11 something with the IRS. I wouldn't have hesitated to</p> <p>12 have signed anything at that time.</p> <p>13 Q. Okay. So now we're going to talk about the</p> <p>14 bank accounts and look at some bank documents.</p> <p>15 A. All right.</p> <p>16 MS. PAGE: Let's mark this as Exhibit 3.</p> <p>17 (Exhibit 3 marked.)</p> <p>18 Q. (BY MS. PAGE) Okay. Ms. Umeorah --</p> <p>19 A. Umeorah. It's okay. You can call me Angela.</p> <p>20 Q. Okay. Angela, I'll call you Angela.</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. Angela, what's been marked as Exhibit 3,</p> <p>23 do you recognize this?</p> <p>24 A. This is what, 2007?</p> <p>25 Q. Uh-huh.</p>

<p style="text-align: right;">Page 77</p> <p>1 a thing showing that, and I believe it was in 2015 -- or</p> <p>2 2014, towards the middle. There are some things that if</p> <p>3 I had access to, I will know exactly whenever Chris now</p> <p>4 allowed us to get back into the accounts. He left a</p> <p>5 signature sheet at the Wells Fargo bank. Me and Michael</p> <p>6 went and signed it. That's what gave us access to the</p> <p>7 account. Before that time, I didn't know what all was</p> <p>8 going on.</p> <p>9 Q. Okay. But you are a signatory to the</p> <p>10 Account 8707, ending 8707; is that correct?</p> <p>11 A. Now, I think this is -- and I have to go back</p> <p>12 and check -- is the checking account for Beaumont</p> <p>13 business is 8707. That's how it ends. I'm a signature</p> <p>14 to that one, 8707, after we got back. I mean, now that</p> <p>15 we're back, I'm a signature to all the accounts.</p> <p>16 Q. Okay.</p> <p>17 A. But in 2013, I wasn't. So I know I didn't --</p> <p>18 you know, this 2013 is still the date? Yeah, 2013. We</p> <p>19 didn't -- we didn't become signatures in 2013.</p> <p>20 Q. So what is the 8707 account used for?</p> <p>21 A. It's -- the person in Beaumont, that's how --</p> <p>22 what she uses to run that office.</p> <p>23 Q. Okay.</p> <p>24 A. And Jubilee will put money in there for her.</p> <p>25 She will use it to sign on that office.</p>	<p style="text-align: right;">Page 79</p> <p>1 can't pay, they will transfer it to her here.</p> <p>2 Q. So they would transfer money out of the</p> <p>3 operating account to her account so that she could use</p> <p>4 it for expenses?</p> <p>5 A. (Witness nodding head.)</p> <p>6 Q. How would Jubilee know what amount to transfer?</p> <p>7 A. She will communicate. You know, she will put</p> <p>8 in a request and say that this home, this home, this</p> <p>9 apartment or this needs money or these dental fees needs</p> <p>10 to be paid or this office bill needs to be paid.</p> <p>11 Q. And would she usually get what she requested?</p> <p>12 A. Not all the time.</p> <p>13 Q. Who makes that decision?</p> <p>14 A. Right now it's Michael after Michael started</p> <p>15 handling things.</p> <p>16 Q. So he would determine what bills she could pay?</p> <p>17 A. Yeah. Or, you know, how to -- just whatever</p> <p>18 funding is available, how to pay. He's the one that</p> <p>19 would transfer money to her.</p> <p>20 MS. PAGE: Okay. I do have some more bank</p> <p>21 statements. Please mark this.</p> <p>22 (Exhibit 13 marked.)</p> <p>23 Q. (BY MS. PAGE) Angela, can you look at what's</p> <p>24 been marked as Exhibit 13 and identify this, if you</p> <p>25 could.</p>
<p style="text-align: right;">Page 78</p> <p>1 Q. Do any payroll checks -- are any payroll checks</p> <p>2 issued from this account?</p> <p>3 A. Uh-uh. No.</p> <p>4 Q. Which account are the payroll checks?</p> <p>5 A. 8 -- this one, 8696.</p> <p>6 Q. Okay. Well, let's -- just to complete this --</p> <p>7 A. 8699. I'm sorry. 8699, 8699.</p> <p>8 MS. PAGE: Let's get this marked, please,</p> <p>9 Exhibit 12.</p> <p>10 (Exhibit 12 marked.)</p> <p>11 Q. (BY MS. PAGE) Government Exhibit 12 is a</p> <p>12 collection of statements that -- where we see from</p> <p>13 Wells Fargo Bank regarding 8 -- the Account Number 8707.</p> <p>14 A. Yes.</p> <p>15 Q. And you just said that this is the operating</p> <p>16 account of Beaumont?</p> <p>17 A. Yes.</p> <p>18 Q. Who has access to this account?</p> <p>19 A. The person that handles this account is</p> <p>20 Arvy McKinney. She's actually the only one.</p> <p>21 Q. And what does she use this account for?</p> <p>22 A. She uses it to manage that company over there.</p> <p>23 So the clients' moneys that come in would go in here.</p> <p>24 If Jubilee were to send her any money to pay the office</p> <p>25 rent or to pay for any of the homes that the clients</p>	<p style="text-align: right;">Page 80</p> <p>1 A. Yes. This one is the account we're operating</p> <p>2 now. But I don't recognize this statement because it's</p> <p>3 dated 2007.</p> <p>4 Q. And this account ends --</p> <p>5 MR. WILLIAMS: Look at the whole --</p> <p>6 THE WITNESS: I'm looking.</p> <p>7 Q. (BY MS. PAGE) -- ends 8691; correct?</p> <p>8 A. Yes, I'm looking at it.</p> <p>9 MR. WILLIAMS: All of it, to the end.</p> <p>10 THE WITNESS: All right.</p> <p>11 Q. (BY MS. PAGE) Okay. So looking at the last</p> <p>12 page, which is 000255, it appears that you're an</p> <p>13 authorized signer on this account?</p> <p>14 A. I know nothing of this account. I mean, I know</p> <p>15 of this account. This is our account now. As of 2013,</p> <p>16 you know, however this was all gathered together, I</p> <p>17 wasn't part of it. I'm 100 percent sure.</p> <p>18 Q. And so that's not your signature?</p> <p>19 A. I mean, this one now looks like my signature</p> <p>20 but -- this one looks like my signature.</p> <p>21 Q. Okay. But you are a signer on this account?</p> <p>22 A. I am now. That's what I'm saying, in 2000 -- I</p> <p>23 mean, somebody put me there. I'm not saying that my</p> <p>24 name could not be affixed there, but I didn't know it</p> <p>25 existed. Like, you know, I didn't -- I wasn't aware it</p>

<p style="text-align: right;">Page 81</p> <p>1 existed. I didn't take part of it. I didn't know. And</p> <p>2 I was not even made aware. Because in 2015 when I came</p> <p>3 back, I wasn't a signature. Nobody said, "Oh, you're a</p> <p>4 signature. Go there. You're a signature," no. So I</p> <p>5 wasn't part of this. I don't know how this was arranged</p> <p>6 or what happened or how it was put together.</p> <p>7 But that looks like I signed it, but I</p> <p>8 didn't sign it for -- at this time, I didn't sign it in</p> <p>9 2013, and this account is our current account.</p> <p>10 Q. Okay.</p> <p>11 A. But I wasn't part of this in -- I mean, you</p> <p>12 know, 2007 at the beginning and then you have 2013 at</p> <p>13 the end. So I don't understand it.</p> <p>14 Q. Okay.</p> <p>15 A. What was the address of this bank? Let me see.</p> <p>16 This bank, Wells Fargo was where? Is there an address</p> <p>17 on it?</p> <p>18 MS. PAGE: Mark this Exhibit 14.</p> <p>19 (Exhibit 14 marked.)</p> <p>20 Q. (BY MS. PAGE) Okay. If you'll just flip</p> <p>21 through 14 and generally -- does this look like</p> <p>22 statements for account number ending in 8699 from</p> <p>23 Wells Fargo Bank?</p> <p>24 A. Yeah.</p> <p>25 Q. Does payroll come out of this account?</p>	<p style="text-align: right;">Page 83</p> <p>1 name -- however you say his last name, when did he start</p> <p>2 working for -- as the accountant for Jubilee?</p> <p>3 A. I don't know. That happened while I was away.</p> <p>4 I came back to meet him.</p> <p>5 Q. And before him who processed the paychecks?</p> <p>6 A. I don't know who processed it. Chris would be</p> <p>7 the best person. He was the one handling all that. He</p> <p>8 will answer better.</p> <p>9 MS. PAGE: Okay. We're almost through</p> <p>10 these bank accounts. I don't know if it's worth all</p> <p>11 this paper or not, but...</p> <p>12 (Exhibit 15 marked.)</p> <p>13 Q. (BY MS. PAGE) She just handed you Exhibit 15,</p> <p>14 which is additional bank statements from Wells Fargo for</p> <p>15 an account that's ending 8699.</p> <p>16 A. Yes.</p> <p>17 Q. And the one question I have is: Exhibit 14,</p> <p>18 the address is Spring Grove, but on Exhibit 15 Jubilee's</p> <p>19 address is Puerta Vista. Do you know why that is?</p> <p>20 A. I'm not sure. Chris was handling all this at</p> <p>21 that time. But I know that Spring Grove used to be the</p> <p>22 office, and I know that Puerta Vista is his home</p> <p>23 address.</p> <p>24 Q. Okay. Where do the bank statements for the</p> <p>25 operating account go to now?</p>
<p style="text-align: right;">Page 82</p> <p>1 A. Yes.</p> <p>2 Q. And how -- how exactly does payroll get to --</p> <p>3 like the paychecks get to the people in Beaumont?</p> <p>4 A. Right now Dominic will do it, and then it will</p> <p>5 be shipped over to Beaumont like overnight.</p> <p>6 Q. Dominic is --</p> <p>7 A. The accountant.</p> <p>8 Q. Okay.</p> <p>9 A. He will do it.</p> <p>10 Q. He would do -- he would cut --</p> <p>11 A. Do the payroll.</p> <p>12 Q. -- the checks?</p> <p>13 A. Yes.</p> <p>14 Q. And how would he know what to cut?</p> <p>15 A. Because it is processed and sent to him.</p> <p>16 Q. It's processed by who?</p> <p>17 A. The hours worked and all of that is processed</p> <p>18 in Beaumont. And I'm not sure about this now -- Michael</p> <p>19 probably will know -- either it's sent to Michael to</p> <p>20 look through and approve before sending to Dominic.</p> <p>21 That's what I'm assuming, but Michael will answer better</p> <p>22 this question. But I think that's what happens.</p> <p>23 Beaumont will see who works what. They will send it to</p> <p>24 Michael, and Michael will send it to Dominic.</p> <p>25 Q. Okay. Mr. Dominic Amaugwu, whatever his last</p>	<p style="text-align: right;">Page 84</p> <p>1 A. I'm not sure. Michael would know.</p> <p>2 Q. You don't know?</p> <p>3 A. Uh-uh. No, I don't know.</p> <p>4 MS. PAGE: I'm going to go ahead and get</p> <p>5 this marked also.</p> <p>6 (Exhibit 16 marked.)</p> <p>7 Q. (BY MS. PAGE) Does this appear -- Exhibit 16</p> <p>8 appear to be a statement for that same Wells Fargo</p> <p>9 account, 8699?</p> <p>10 A. Uh-huh.</p> <p>11 Q. And now I notice the address is Old Windsor</p> <p>12 Way?</p> <p>13 A. Oh. So that's our house. Michael is having it</p> <p>14 sent to our house.</p> <p>15 Q. Is that because you-all don't have an office?</p> <p>16 A. No, we have none, apart from Beaumont, and I</p> <p>17 believe he doesn't want it to go there. Maybe they were</p> <p>18 opening it, and he didn't want to go to there.</p> <p>19 (Exhibit 17 marked.)</p> <p>20 Q. (BY MS. PAGE) Okay. Angela, you're looking at</p> <p>21 Exhibit 17 --</p> <p>22 A. Yes.</p> <p>23 Q. -- which is copies of checks on Jubilee's</p> <p>24 account --</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 89</p> <p>1 is --</p> <p>2 A. That looks like somebody in Beaumont, too.</p> <p>3 Q. And that's signed by Chris?</p> <p>4 A. Uh-huh.</p> <p>5 Q. The next page is Ashiro -- there's a check, I</p> <p>6 believe, to Ashiro Jenkins. Does this look like a</p> <p>7 payroll check?</p> <p>8 A. What number?</p> <p>9 Q. Oh. 299.</p> <p>10 A. I mean, the person is in Beaumont. But, you</p> <p>11 know, that doesn't look like a stamp signature, but it's</p> <p>12 in Beaumont. Probably a payment that was made in</p> <p>13 Beaumont. So maybe somebody didn't get their check or</p> <p>14 something happened. But that person is a Beaumont</p> <p>15 person. Beaumont --</p> <p>16 Q. Could that be a paycheck? Is that what</p> <p>17 paychecks look like?</p> <p>18 A. No. Paychecks look more like those ones -- the</p> <p>19 ones you see the stamp, that's what they look like, like</p> <p>20 in 295.</p> <p>21 Q. Oh, okay.</p> <p>22 A. Those ones are a stamp. That's what they look</p> <p>23 like.</p> <p>24 Q. Okay.</p> <p>25 A. And 296.</p>	<p style="text-align: right;">Page 91</p> <p>1 know, just getting payments made. I'm not too sure. He</p> <p>2 would know.</p> <p>3 Q. On Page -- let's see, these are not marked.</p> <p>4 On the sixth page back, there's a copy of a</p> <p>5 check, and it's made out to you --</p> <p>6 A. Uh-huh.</p> <p>7 Q. -- for \$500. What is -- what would you -- do</p> <p>8 you know what that is for?</p> <p>9 A. Uh-huh.</p> <p>10 Q. What's that for?</p> <p>11 A. Beaumont travel, petty cash.</p> <p>12 Q. Are you being reimbursed?</p> <p>13 A. Yes.</p> <p>14 Q. That's not a paycheck?</p> <p>15 A. No.</p> <p>16 Q. Are you getting a paycheck at this time?</p> <p>17 A. No.</p> <p>18 Q. Are you getting administrative fees at this</p> <p>19 time?</p> <p>20 A. (Witness shaking head.)</p> <p>21 Q. Okay. The next page --</p> <p>22 MR. WILLIAMS: Answer the question.</p> <p>23 A. Oh, I'm sorry. I'm sorry. Say that again. Am</p> <p>24 I get -- I'm not getting paid, no. But if I do anything</p> <p>25 for Jubilee that entails money, I get reimbursed.</p>
<p style="text-align: right;">Page 90</p> <p>1 Q. And then the next two checks are signed by you,</p> <p>2 and they're the IRS, Check 300, 301; and 302, is that</p> <p>3 signed by Michael?</p> <p>4 A. Which page?</p> <p>5 Q. 302.</p> <p>6 A. Yes.</p> <p>7 MS. PAGE: Okay. Let's move on.</p> <p>8 (Exhibit 18 marked.)</p> <p>9 Q. (BY MS. PAGE) Angela, could you look at this</p> <p>10 document that's been labeled -- marked Exhibit 18 --</p> <p>11 A. Okay.</p> <p>12 Q. -- which is a bank statement, Wells Fargo</p> <p>13 account number ending 2496. Do you recognize this bank</p> <p>14 account?</p> <p>15 A. Yeah.</p> <p>16 Q. What is it?</p> <p>17 A. I'm thinking that's it. Michael set up a</p> <p>18 dedicated IRS account just to make sure that we meet our</p> <p>19 payments or he will take money from the excess balance</p> <p>20 and put in that account; and that account, only him runs</p> <p>21 it. He just make sure that money goes to IRS. That's</p> <p>22 what that account is, I'm pretty sure it is. It's our</p> <p>23 IRS-dedicated account.</p> <p>24 Q. Okay. Do you know when that was set up?</p> <p>25 A. Whenever he took over and was working on, you</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. (BY MS. PAGE) Okay. The next page is Check</p> <p>2 Number 2529.</p> <p>3 A. Yes.</p> <p>4 Q. And that's made out to Michael --</p> <p>5 A. Yes.</p> <p>6 Q. -- Umeorah --</p> <p>7 A. Yes.</p> <p>8 Q. -- for \$2,200. What's this?</p> <p>9 A. He will answer, but I know. The dentist, the</p> <p>10 dental is here in Houston. So they will come. Somebody</p> <p>11 call Michael, and the dentist wants to be paid before he</p> <p>12 sees them. And he will usually run there and give them</p> <p>13 money or give them a check or something. So that's what</p> <p>14 that is, and it would be for that doctor.</p> <p>15 Q. Is this Michael's handwriting or your</p> <p>16 handwriting?</p> <p>17 A. It's Michael's.</p> <p>18 Q. It's Michael's. Okay.</p> <p>19 MS. PAGE: So we can take a break now.</p> <p>20 (Recess from 11:50 a.m. to 11:59 a.m.)</p> <p>21 Q. (BY MS. PAGE) Angela, in regards to Jubilee, do</p> <p>22 you know if there's ever been a time when Jubilee has</p> <p>23 been able -- been unable to pay rent, utilities?</p> <p>24 A. No. I mean, difficult, it's trying here and</p> <p>25 there; but, no, we've always been able to pay our bills.</p>

<p style="text-align: right;">Page 93</p> <p>1 Q. Except for the taxes?</p> <p>2 A. Except for the taxes.</p> <p>3 Q. At some point did you realize there were money</p> <p>4 problems?</p> <p>5 A. You mean while I was still here?</p> <p>6 Q. Uh-huh.</p> <p>7 A. I was thinking it wasn't -- you know, it was</p> <p>8 beginning to show its face, but it was being managed and</p> <p>9 paid. You know, it was beginning to raise its head that</p> <p>10 it was hidden that way, but we were managing to pay. It</p> <p>11 was becoming challenging.</p> <p>12 Q. You testified that in the beginning the -- the</p> <p>13 four directors put money into the company. Did you ever</p> <p>14 put money in after that?</p> <p>15 A. You mean like into the business?</p> <p>16 Q. Yes.</p> <p>17 A. I can't remember. But there have been</p> <p>18 instances -- yeah, there have been instances we've had</p> <p>19 to put in personal money. I don't know the amount now</p> <p>20 or the particular time, but there have been instances</p> <p>21 that we had to get money from somewhere to meet</p> <p>22 obligations, yes.</p> <p>23 Q. And get money from?</p> <p>24 A. Other things we were doing. I mean, because</p> <p>25 like we still owned other things.</p>	<p style="text-align: right;">Page 95</p> <p>1 when did you first become aware of the tax problems?</p> <p>2 A. When I came back and an IRS person put</p> <p>3 something on my door.</p> <p>4 Q. Okay. So that would be about in 2014, '15?</p> <p>5 A. Maybe '14, '15. Maybe that's it. I'm not sure</p> <p>6 now.</p> <p>7 Q. Or 2013?</p> <p>8 A. But they contacted me and came to my door. I</p> <p>9 was just -- came to my door and asked me -- they put a</p> <p>10 note in front of our house and told me where to report.</p> <p>11 Q. So it was at your house on Old Windsor?</p> <p>12 A. Yes.</p> <p>13 Q. There was a note saying "Call us"?</p> <p>14 A. Call the IRS and come, yeah. You know, I'm not</p> <p>15 sure exactly that first time.</p> <p>16 Q. Would it have been before you left?</p> <p>17 A. Oh, no. No. Before I left, it wasn't like</p> <p>18 that at all. Before I left, payments were being made.</p> <p>19 It wasn't -- it wasn't an issue the way it is or the way</p> <p>20 it became.</p> <p>21 Q. Okay. Now, in regards to when you left --</p> <p>22 A. Yes.</p> <p>23 Q. -- what -- are the only documents that you have</p> <p>24 that support when you left the country your passport</p> <p>25 information?</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. Oh, owned other?</p> <p>2 A. Yeah.</p> <p>3 Q. What else did you own?</p> <p>4 A. Myself and my husband, we owned our food store</p> <p>5 and it was doing well, you know. Chris was working, you</p> <p>6 know. So --</p> <p>7 Q. So there was other income from other avenues?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Did you-all have corporate meetings?</p> <p>10 A. While -- before I left? While we were --</p> <p>11 Q. That you know of.</p> <p>12 A. I mean, we would meet and talk about things,</p> <p>13 yes.</p> <p>14 Q. Did anyone take minutes?</p> <p>15 A. I don't believe it was that formalized.</p> <p>16 Q. Did you ever have meetings over the telephone</p> <p>17 when you were in Nigeria about the business?</p> <p>18 A. When I left -- already, I wasn't even part of</p> <p>19 business before I left. I wasn't -- two to three years</p> <p>20 before I left, I was not part of the decision-making or</p> <p>21 anything going on in Jubilee. From that time I left up</p> <p>22 until I became a signature into this account, I was not</p> <p>23 a part of this business in any way, shape, manner or</p> <p>24 form, meetings or knowing what was going on, nothing.</p> <p>25 Q. I don't know if I asked you this before, but</p>	<p style="text-align: right;">Page 96</p> <p>1 A. I don't know. I mean, one can always look --</p> <p>2 like my son registered in school, you know, would that</p> <p>3 be a supporting document, that my son became a pupil in</p> <p>4 a school in Nigeria. He was only 4 years old. I mean,</p> <p>5 that's the one we supplied, that our passport showed we</p> <p>6 left, but there are other things that would show that we</p> <p>7 left. Like once I got there, I enrolled my child in</p> <p>8 school. You know, I was living somewhere. I had a</p> <p>9 lease where I lived. You know, we leased a place. We</p> <p>10 had a lease. We had to lease where we lived.</p> <p>11 I mean, we didn't bring all of those, but</p> <p>12 those could be also evidence that I had a lease there, a</p> <p>13 lease there. And my passport mostly, you know. And my</p> <p>14 son was in school or just starting school. I don't</p> <p>15 know. There are other things, depending on what</p> <p>16 evidence could be brought, the fact that I left. So if</p> <p>17 there are other evidence that could be -- help, they can</p> <p>18 be brought. They are there.</p> <p>19 Q. Okay. Well, I might like to see some of the</p> <p>20 this corroborating evidence --</p> <p>21 A. Yes. Like if I wrote America International</p> <p>22 School and say "When did my son register there," they</p> <p>23 will bring it. I could contact that company that leased</p> <p>24 us that apartment -- not apartment, you know, the duplex</p> <p>25 where we lived, they could bring that lease, that</p>

Page 105	Page 107
<p>1 Q. So you're not contract? This is --</p> <p>2 A. It's contract.</p> <p>3 Q. Okay.</p> <p>4 A. And I worked for the prison, Corizon Health.</p> <p>5 Q. Horizon?</p> <p>6 A. Corizon, C-O-R-I-Z-O-N, I worked for them as</p> <p>7 well, Corizon Health.</p> <p>8 Q. Presently?</p> <p>9 A. Uh-huh. Oh, yeah. Off and on.</p> <p>10 Q. Had you ever been involved with any other</p> <p>11 company that's had problems making their payroll taxes?</p> <p>12 A. No. Well, let me take it back a little bit</p> <p>13 because by -- when I -- before I left, right, when I --</p> <p>14 I left in 2004. Between 2000 and 2003, I had another</p> <p>15 company. I opened a home health agency.</p> <p>16 Q. Okay.</p> <p>17 A. It was called City Home Health.</p> <p>18 Q. CT?</p> <p>19 A. C-I-T-Y.</p> <p>20 Q. Oh, City?</p> <p>21 A. Yeah. And for them, while I was here running</p> <p>22 it, I paid my taxes when due to two weeks. Then I left.</p> <p>23 Then I left it for somebody as well to manage, and I</p> <p>24 believe he ran into problems. But I think he resolved</p> <p>25 those issues.</p>	<p>1 you provided.</p> <p>2 MS. PAGE: So this is going to be</p> <p>3 Exhibit 20.</p> <p>4 (Exhibit 20 marked.)</p> <p>5 Q. (BY MS. PAGE) Okay. Exhibit 20 is a copy, I</p> <p>6 guess, of a tax return that you provided in discovery to</p> <p>7 us, the Government. Who is Bolu --</p> <p>8 A. Our personal accountant, Bolu Omodele.</p> <p>9 Q. And has he -- how long has he been preparing</p> <p>10 your tax returns?</p> <p>11 A. For a long time, as long as I remember.</p> <p>12 Q. Generally what do you -- how do you interact</p> <p>13 with him? Do you meet with him or --</p> <p>14 A. I meet him, yes.</p> <p>15 Q. And give him information?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. This first tax return, 2005, that's</p> <p>18 Exhibit 20, shows on Schedule C, which is one, two,</p> <p>19 three, four -- do you see after Schedule A it's</p> <p>20 Schedule C? Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. It shows a Schedule C, a profit or loss from</p> <p>23 business, administrative services. Do you know what</p> <p>24 that is in regards to?</p> <p>25 A. We -- we had City -- at that time we had City</p>
Page 106	Page 108
<p>1 Q. Who did you leave --</p> <p>2 A. Kevin Joseph. But I wasn't -- I wasn't really</p> <p>3 working for him. I wasn't working at City at the time I</p> <p>4 had left.</p> <p>5 Q. Okay. So City Health was your business?</p> <p>6 A. I started it, yes. And I kind of relinquished</p> <p>7 it to somebody else.</p> <p>8 Q. Okay. And while you were working at City</p> <p>9 Health from 2000 to 2003, were you in charge of the</p> <p>10 payroll taxes?</p> <p>11 A. And it was made. I was. And it was paid when</p> <p>12 due.</p> <p>13 Q. Okay. So you were aware of payroll deposits</p> <p>14 early on?</p> <p>15 A. My accountant was doing that, yes. I had</p> <p>16 gotten him from Jubilee, you know, on what to do, yes.</p> <p>17 Q. Okay. Who would you say is the ultimate</p> <p>18 decision-maker of Jubilee. Would it be all four of you</p> <p>19 together when you were here?</p> <p>20 A. From the beginning? At the beginning, it was</p> <p>21 all four of us. When -- when me and Nina pulled out, it</p> <p>22 was Michael and Chris. When Michael left -- when</p> <p>23 Michael went to Nigeria, it became Chris, Chris and</p> <p>24 Nina, I guess.</p> <p>25 Q. I'm going to go through your tax returns that</p>	<p>1 Medical, and we had Angel's Food Store. So we had -- we</p> <p>2 had businesses. Is that what --</p> <p>3 Q. Okay. Well, the next page is the City Medical</p> <p>4 Services.</p> <p>5 A. Okay.</p> <p>6 Q. Is that what you referred to a minute ago?</p> <p>7 A. Yeah.</p> <p>8 Q. So this is reporting the income from City</p> <p>9 Medical Services of 364 -- gross receipts of \$364,722.</p> <p>10 Do you see that?</p> <p>11 A. Yeah. Uh-huh.</p> <p>12 Q. And so City Medical Services, was it owned by</p> <p>13 you and Michael?</p> <p>14 A. Yes.</p> <p>15 Q. And can you just go into a little bit more</p> <p>16 detail again, I mean, about what this did.</p> <p>17 A. This one was different. This is a home health</p> <p>18 service where you go see elderly people and -- you know,</p> <p>19 people like in their homes. It's different. Not like</p> <p>20 you keep them in a home, but you go make physical</p> <p>21 therapy visit, operational therapy visits. It was that</p> <p>22 kind of a home health agency, Different from Jubilee.</p> <p>23 Q. And so it had -- you had employees?</p> <p>24 A. Yes.</p> <p>25 Q. And --</p>

<p style="text-align: right;">Page 109</p> <p>1 A. Well, you know, a few employees, but mainly 2 people on contract, like nurses. We had nurses. We 3 had -- 4 Q. Aides? 5 A. Yes. We had CNAs. We had PT on contract. 6 Q. Okay. So was this primarily your business or 7 Michael's? 8 A. We always own everything together, me and 9 Michael. So -- 10 Q. All right. And then Schedule C before that, 11 could this administrative services be money that you 12 received from Jubilee? 13 A. 2005 Michael was here. It could be. I don't 14 know. 2005, Michael was here. 15 Q. Because there's receipts -- 16 A. He could still be receiving a salary from 17 Jubilee at that time. He was still part running -- part 18 of running Jubilee. Him and Chris were running it in 19 2005. 20 Q. Does 60,000 a year sound about right? 21 A. Maybe. I don't know. I really don't know. 22 Q. Then this is 2005. And on the next Schedule E, 23 here's these addresses again, Spring Grove, Belfast, 24 Wolfe. Then the next page there's two more. 25 A. Okay.</p>	<p style="text-align: right;">Page 111</p> <p>1 husband from Mr. Omodele? 2 A. Uh-huh. Yes. 3 Q. And this is your copy. Would you have signed 4 this -- 5 A. Yes. 6 Q. -- and filed it? 7 A. Yes. 8 Q. Look at the Schedule Cs. It looks like you 9 still have the same administrative services and the 10 City. There's also -- if you look on the front page of 11 the return, the 1040, there's wages of 12,000. Do you 12 know what that would have been regarding? 13 A. Where is it? 14 Q. On the income reported. It's Page 3. 15 A. Oh, okay. I'm not sure. 16 Q. 2006. 17 A. Yeah. I mean, we had Angel's at that time. 18 Michael was here. So I'm not sure. It may be from 19 Angel's Foods. 20 Q. Oh, Angel's Foods? 21 A. Yeah. We had a food business. 22 Q. Right. 23 A. We had -- 24 Q. What -- was it a corporation, or was it -- 25 A. Uh-uh. It was just a food store. It was an</p>
<p style="text-align: right;">Page 110</p> <p>1 Q. So at this time, apparently, you owned these -- 2 A. Yes. 3 Q. -- five properties? 4 A. Yes. 5 Q. And receiving rent? 6 A. We didn't ever receive rent in any one of them. 7 You know, whatever money was paid, we didn't receive any 8 personal money from them. Whatever money was paid was 9 put into account and used it to pay the mortgage. 10 Q. Okay. 11 A. Like that's how it was done. 12 Q. Okay. So this is a tax return that -- it's a 13 copy. It's not signed. But would have you signed this 14 and filed it? 15 A. Yeah. 16 Q. Okay. 17 A. I believe. 18 Q. Okay. So that's all for that. 19 MS. PAGE: Mark 21. 20 (Exhibit 21 marked.) 21 Q. (BY MS. PAGE) Angela, you've just been given a 22 document, Government Exhibit 21. Do you recognize this 23 document? 24 A. This is a tax return, yeah. 25 Q. So this return was prepared for you and your</p>	<p style="text-align: right;">Page 112</p> <p>1 indigenous food store, like an African food store. 2 Q. Okay. So you're not sure what that is? 3 A. I mean, where that one came from, whether it 4 was from -- Michael was here at that time. I'm not 5 sure. 6 Q. So how would you sign these if you weren't in 7 the country? Did you sign them? 8 A. I don't know. 9 Q. Let's get this next one marked, the 2007 10 return. 11 (Exhibit 22 marked.) 12 Q. (BY MS. PAGE) Okay. This is your -- 13 Exhibit 22, do you recognize this, 2007? On the second 14 page, is that your signature on DOJ 001200? 15 A. Yes. 16 Q. Okay. And I'll ask Michael about these 17 administrative services since you're not sure what that 18 was. 19 A. Okay. 20 Q. It says a business address of the 21 administrative services, which is DOJ 001202. 22 A. O-S-A-G-E? Where, where is the address at? 23 Q. 1202. Administrative services -- 24 A. This one? That's our home address. 25 Q. Yeah.</p>

Page 117	Page 119
<p>1 A. By that time, this must be like my ending, like</p> <p>2 maybe I have started coming back.</p> <p>3 Q. Okay.</p> <p>4 A. I started coming back and working as a nurse.</p> <p>5 Q. Were you making income in Nigeria at the time?</p> <p>6 A. I mean, it was mainly a family business, but --</p> <p>7 you know, our bills were paid, but I wouldn't say we</p> <p>8 were making income.</p> <p>9 Q. Does Nigeria have income tax returns?</p> <p>10 A. I believe. Every country has income tax</p> <p>11 returns, I believe. I believe they do.</p> <p>12 Q. Okay. Were you -- so you were working. Okay.</p> <p>13 (Exhibit 25 marked.)</p> <p>14 Q. (BY MS. PAGE) Okay, Angela. Exhibit 25, is</p> <p>15 this another return prepared by Mr. Omodele?</p> <p>16 A. Yes.</p> <p>17 Q. And this is just your copy that he gives you;</p> <p>18 is that right?</p> <p>19 A. Yes.</p> <p>20 Q. After he does your taxes, he gives you a copy?</p> <p>21 A. Yes.</p> <p>22 Q. Do you file it yourself, or does he file it?</p> <p>23 A. He file it. Like when I was there, he would</p> <p>24 send them. He will send them. We'll sign them. We'll</p> <p>25 send it back. It all depends. My husband handles that.</p>	<p>1 Q. And this is your tax return for 2011?</p> <p>2 A. Yes, it is.</p> <p>3 Q. And then you have a nursing services again in</p> <p>4 2011 that you came back for?</p> <p>5 A. Yeah.</p> <p>6 Q. When you came back, did you -- did you ever</p> <p>7 work for Jubilee or check in with Jubilee at all?</p> <p>8 A. No, never. I knew nothing about Jubilee. I</p> <p>9 did not talk to them even, so...</p> <p>10 Q. It looks like this one was filed, if you look</p> <p>11 at the last page by E-File?</p> <p>12 A. By who?</p> <p>13 Q. It was E-Filed. Are you familiar with that?</p> <p>14 A. Uh-uh. I don't know what the E-Filed means.</p> <p>15 MR. WILLIAMS: It's online.</p> <p>16 Q. (BY MS. PAGE) Online.</p> <p>17 A. My husband would probably know.</p> <p>18 Q. Yeah, that's -- I think that's his signature</p> <p>19 down there. Okay.</p> <p>20 (Exhibit 27 marked.)</p> <p>21 Q. (BY MS. PAGE) Could you identify this</p> <p>22 Exhibit 27?</p> <p>23 A. Yeah. Our 2012 income tax report.</p> <p>24 Q. And did you receive any income this year?</p> <p>25 A. 2012?</p>
Page 118	Page 120
<p>1 So he would be the best person to ask.</p> <p>2 Q. So your husband handles the finances in the</p> <p>3 marriage?</p> <p>4 A. Yeah, in terms of he's the one that meets Bolu</p> <p>5 and does all this. I mean, he just gets my 1099 or</p> <p>6 whatever it is I have and pass it on.</p> <p>7 Q. All right. And on Page -- okay, 1, 2, 3, 4, 5,</p> <p>8 6 -- 6 is a Schedule C, Page 6, it should be a</p> <p>9 Schedule C for you; is that right?</p> <p>10 A. Yes.</p> <p>11 Q. Do you know what this is? Is this reporting</p> <p>12 income regarding your nursing services?</p> <p>13 A. All of them, yeah. Either from the agency or</p> <p>14 from Riverside Hospital. Yeah. What year was this?</p> <p>15 MR. WILLIAMS: This was '10.</p> <p>16 A. Yeah. Yeah.</p> <p>17 MS. PAGE: Okay. 26. We're getting near</p> <p>18 the end of the returns.</p> <p>19 (Exhibit 26 marked.)</p> <p>20 Q. (BY MS. PAGE) Okay. Angela, if you can look at</p> <p>21 Exhibit 26 and tell me what this is.</p> <p>22 A. This is the nursing services; right? Is it the</p> <p>23 one that you're asking me, this one?</p> <p>24 Q. Is that your name and signature?</p> <p>25 A. Oh, yeah, it is. It is.</p>	<p>1 Q. Uh-huh.</p> <p>2 A. Uh-huh. Yeah, from Houston.</p> <p>3 Q. From nursing?</p> <p>4 A. Yeah. By this time, yeah, I started even</p> <p>5 working more, yeah. This time it would be agency. I</p> <p>6 believe this one I started also working for</p> <p>7 Texas Specialty.</p> <p>8 Q. And at this time was your husband in the</p> <p>9 United States --</p> <p>10 A. No.</p> <p>11 Q. -- 2012?</p> <p>12 A. No. He was in Nigeria. He didn't come back</p> <p>13 until two years after we came back.</p> <p>14 Q. Okay. So you came back --</p> <p>15 A. With my son.</p> <p>16 Q. Right.</p> <p>17 (Exhibit 28 marked.)</p> <p>18 Q. (BY MS. PAGE) Could you identify Exhibit 28,</p> <p>19 please?</p> <p>20 A. Yes. Our 2013 income tax return.</p> <p>21 Q. Now, on this return, if you look on the first</p> <p>22 page of the return, there's wages of 131,000 in 2013.</p> <p>23 Do you -- would you know what that is?</p> <p>24 A. My income.</p> <p>25 Q. That's your income?</p>

Page 125	Page 127
<p>1 thing.</p> <p>2 (Exhibit 32 marked.)</p> <p>3 MS. PAGE: I'm going to also get this</p> <p>4 marked at this time. 33, please.</p> <p>5 (Exhibit 33 marked.)</p> <p>6 Q. (BY MS. PAGE) Okay. So if you'll look at 33</p> <p>7 first. And you said that you reviewed some of your</p> <p>8 discovery before?</p> <p>9 A. Yeah, I looked at it. This morning, I looked</p> <p>10 at it.</p> <p>11 MS. PAGE: Is there one that's written on?</p> <p>12 THE WITNESS: Yes. This one.</p> <p>13 MS. PAGE: That's mine. Sorry about that.</p> <p>14 Q. (BY MS. PAGE) In the first request for</p> <p>15 admission, you deny that you're an officer of Jubilee</p> <p>16 during the periods at issue. But weren't you an officer</p> <p>17 the whole time?</p> <p>18 A. I mean, if I removed my name. I never</p> <p>19 official -- like I told you, I never officially removed</p> <p>20 my name. I just wasn't part of that business or running</p> <p>21 it or -- between when I was away.</p> <p>22 Q. So do you still deny that you were an officer</p> <p>23 during the periods at issue?</p> <p>24 A. My statement is this: I was part of that</p> <p>25 company and was part of owning it. I left in 2004. And</p>	<p>1 returns on and reported.</p> <p>2 A. Oh, do I dispute that? I -- no.</p> <p>3 Q. Okay. You don't dispute the income tax</p> <p>4 liabilities. It's the trust fund recovery penalties;</p> <p>5 correct?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Okay.</p> <p>8 A. Sorry. I didn't understand the question.</p> <p>9 Q. Now, you were in the country in December 31,</p> <p>10 2003; correct?</p> <p>11 A. 2000 and?</p> <p>12 Q. '3.</p> <p>13 A. Yes.</p> <p>14 Q. Do you dispute that you're liable for the trust</p> <p>15 fund recovery penalty for that period?</p> <p>16 A. By that, 2013, I had --</p> <p>17 Q. '3, '3.</p> <p>18 A. Sorry. 2003, I wasn't part of -- you know, I</p> <p>19 had pulled back, me and Nina had pulled back --</p> <p>20 Q. Okay.</p> <p>21 A. -- you know, in whatever was happening there.</p> <p>22 Q. So even when you're in the country, you dispute</p> <p>23 that you're a trust fund recovery -- that you're liable?</p> <p>24 A. You know, and honestly -- and that was 2013,</p> <p>25 right, I wouldn't -- because my husband was also</p>
Page 126	Page 128
<p>1 between 2004 and 2014, you know, when my name was put</p> <p>2 back -- forcefully put back to be a signature of that</p> <p>3 company, I wasn't -- actually, I wasn't part of it. I</p> <p>4 was -- it was kind of like I wasn't -- they didn't want</p> <p>5 me to be part of it because I had to force my way into</p> <p>6 it. I didn't come back into it easily.</p> <p>7 When we requested -- I'm talking too much.</p> <p>8 Let me just hush. When we requested to come into it, it</p> <p>9 was refused. We had to, you know, pull some strings,</p> <p>10 write to family before.</p> <p>11 Q. But you had an ownership interest during the</p> <p>12 whole period; correct?</p> <p>13 A. My name was there. But I wasn't part of</p> <p>14 running it, and I didn't know about it. And things were</p> <p>15 done, you know --</p> <p>16 Q. Let me ask you a question: On your income tax</p> <p>17 liabilities that are in the complaint, do you dispute</p> <p>18 that you owe those income tax liabilities?</p> <p>19 A. Yes.</p> <p>20 Q. You do?</p> <p>21 A. Yes. I dispute that I owed the period when I</p> <p>22 was not --</p> <p>23 Q. No. I'm saying income tax.</p> <p>24 A. Income?</p> <p>25 Q. Uh-huh. Income tax liabilities that you filed</p>	<p>1 representing my interest. So I wouldn't dispute that,</p> <p>2 you know, while I was in the country because Michael was</p> <p>3 still part of the business.</p> <p>4 Q. But he wasn't here?</p> <p>5 A. In 2003, Michael was here.</p> <p>6 Q. Oh, I thought you said '13.</p> <p>7 A. Oh, sorry. Which one did you say 2013 or '3?</p> <p>8 Q. Well, I said 2003, but I thought you switched</p> <p>9 to 2013.</p> <p>10 A. Uh-uh. I'm still talking about --</p> <p>11 Q. 2003.</p> <p>12 A. -- 2003.</p> <p>13 Q. So you don't dispute?</p> <p>14 A. No.</p> <p>15 Q. Okay.</p> <p>16 A. No.</p> <p>17 Q. But you dispute anything in 2004 --</p> <p>18 A. Yes, ma'am.</p> <p>19 Q. -- '5, '6, '7, '8?</p> <p>20 A. So January or whenever -- 2014 whenever my</p> <p>21 name --</p> <p>22 Q. You came back?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Who is Yaw Okore-Adjei? Was he one of</p> <p>25 Jubilee's accountants?</p>

Page 129

1 **A. I can't -- I need to see the name. Is it here?**
 2 Q. Oh, it's on -- I think I switched to
 3 Exhibit 32. It's Number 18, Interrogatory Number 18.
 4 **A. Yes. That's Jubilee's accountant at the time,**
 5 **I believe.**
 6 Q. He was the accountant before Dominic?
 7 **A. Yes.**
 8 Q. Okay. Did you ever deal with him,
 9 Yaw Okore-Adjei?
 10 **A. No.**
 11 Q. Okay.
 12 **A. But -- no.**
 13 Q. All right.
 14 **A. But, I mean, I know him. After I came back and**
 15 **was part of the business, there was some back taxes --**
 16 **something needed to be done that he only was the one.**
 17 **So I believe he knows who I am. I called him and tried**
 18 **to get him to prepare something that wasn't prepared in**
 19 **the tax or something.**
 20 MS. PAGE: That's all the questions I have.
 21 MR. WILLIAMS: I have no questions at this
 22 point.
 23
 24 * * * * *
 25

Page 130

1 CHANGES AND SIGNATURE
 2 WITNESS NAME: DATE OF DEPOSITION:
 3 ANGELA UMEORAH MARCH 15, 2018
 4
 5 PAGE LINE CHANGE REASON
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____
 25 _____

Page 131

1 I, ANGELA UMEORAH, have read the foregoing
 2 deposition and hereby affix my signature that same is
 3 true and correct, except as noted herein.
 4 _____
 5 ANGELA UMEORAH
 6 JOB NO. 355167
 7
 8 THE STATE OF _____
 9 COUNTY OF _____
 10 Before me, _____, on this day
 11 personally appeared ANGELA UMEORAH, known to me (or
 12 proved to me under oath or through
 13 _____) (description of identity card
 14 or other document) to be the person whose name is
 15 subscribed to the foregoing instrument and acknowledged
 16 to me that they executed the same for the purposes and
 17 consideration therein expressed.
 18 Given under my hand and seal of office this _____
 19 day of _____, _____.
 20
 21 _____
 22 NOTARY PUBLIC IN AND FOR
 23 THE STATE OF _____
 24 MY COMMISSION EXPIRES:
 25 _____

Page 132

1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE SOUTHERN DISTRICT OF TEXAS
 3 HOUSTON DIVISION
 4 UNITED STATES OF AMERICA, *
 5 Plaintiff, *
 6 VS. * Case No. 4:17-cv-01164
 7 CHRIS C. ULASI, MICHAEL *
 8 UMEORAH, ANGELA UMEORAH *
 9 NINA U. DENCHUKWU, and *
 10 OCWEN LOAN SERVICING, LLC *
 11 Defendants. *
 12
 13 REPORTER'S CERTIFICATION
 14 ORAL DEPOSITION OF
 15 ANGELA UMEORAH
 16 MARCH 15, 2018
 17 I, Debbie Boothe, Certified Shorthand Reporter
 18 in and for the State of Texas, hereby certify to the
 19 following:
 20 That the witness, ANGELA UMEORAH, was duly
 21 sworn by the officer and that the transcript of the oral
 22 deposition is a true record of the testimony given by
 23 the witness;
 24 I further certify that pursuant to FRCP Rule
 25 30(f)(1) that the signature of the deponent:
 26 ___X___ was requested by the deponent or a party
 27 before the completion of the deposition and returned
 28 within 30 days from date of receipt of the transcript.
 29 If returned, the attached Changes and Signature Page

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 HOUSTON DIVISION

4 UNITED STATES OF AMERICA, *

5 Plaintiff, *

6 VS. * Case No. 4:17-cv-01164

7 CHRIS C. ULASI, MICHAEL *

8 UMEORAH, ANGELA UMEORAH *

9 NINA U. DENCHUKWU, and *

 OCWEN LOAN SERVICING, LLC *

 Defendants. *

10 REPORTER'S CERTIFICATION
11 ORAL DEPOSITION OF
12 ANGELA UMEORAH
13 MARCH 15, 2018

14 I, Debbie Boothe, Certified Shorthand Reporter
15 in and for the State of Texas, hereby certify to the
16 following:

17 That the witness, ANGELA UMEORAH, was duly
18 sworn by the officer and that the transcript of the oral
19 deposition is a true record of the testimony given by
20 the witness;

21 I further certify that pursuant to FRCP Rule
22 30(f)(1) that the signature of the deponent:

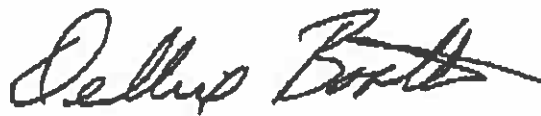
23 __X__ was requested by the deponent or a party
24 before the completion of the deposition and returned
25 within 30 days from date of receipt of the transcript.
 If returned, the attached Changes and Signature Page

1 contains any changes and the reasons therefor;

2 _____ was not requested by the deponent or a
3 party before the completion of the deposition.

4 I further certify that I am neither attorney
5 nor counsel for, related to, nor employed by any of the
6 parties to the action in which this testimony was taken.
7 Further, I am not a relative or employee of any attorney
8 of record in this cause, nor am I financially or
9 otherwise interested in the outcome of the action.

10 Subscribed and sworn to on this the 27th
11 day of March, 2018.

12 
13

14 _____
15 DEBBIE BOOTHE, CSR
16 Texas CSR 4708
17 Expiration Date: 12-31-18
18 Lexitas
19 Firm Registration No. 95
20 13101 Northwest Freeway, Suite 210
21 Houston, Texas 77040
22 281-469-5580
23
24
25

JOB NO. 355167